

15.2.7

2082

93325084

P.O. Box 8074

NANWAIK, ALASKA

99603-6674

Nov. ~~19~~¹⁹ 1992

Exxon Valdez Oil Spill

Public Information Center

645 G Street

Anchorage, Alaska

Trustee Council Member

I am writing to you regarding some Traditional
Subsistence area which were destroyed by Oil Spill
at Windy Bay & Port Chatham. I understand there is
money available for restoration of lost resources
which were affected by the Oil Spill. We feel nothing
can replace the clam loss at Windy Bay & Port Chatham
& would like to pursue clam restoration at
Port Chatham & Passage Island which is located between
Port Graham & Nanwalek.

Please consider our needs we would like
to help our people & communities by providing jobs
opportunities, subsistence foods & economic development to
our communities & people.

Thank you

Sincerely

Mark Kraschkeff

93325085

November 20, 1992

Dear Trustee Council members,

I am writing to you in regards to funds available to restore our subsistence foods.

I am the village chief's wife, and I am a subsistence user. I

I am in support of the Chugachmiut Natural Resource Department's proposal ~~of the~~ request on our behalf.

Since the 1989 oil spill there has been a feeling of lost heritage, "The Way of Life", ~~Chugachmiut~~ ^{Natural} Gathering

I urge you to support our ^{food} subsistence life style, and consider the ~~Natural~~ Chugachmiut Natural Resources Department's Proposal.

It is for us.

Sincerely,

Natalie Kwasnikoff

Emilie Sweeney
PO Box 8055
Nanwalek, AK 99603

93325086

Exxon Valdez Oil Spill
Public Information Center
645 G. Street
Anchorage, Alaska

November 10, 1992

Trustee Council Member:

I am a resident of Nanwalek and a
Nanwalek Traditional Council Member.

I am writing in support of the restoration
of affected areas by the oil spill.

There were many subsistence foods lost.

I support the Nanwalek Salmon Enhancement
Project, Chugach Region Village Mariculture Project,
Bivalve Shellfish Hatching and Research Center also
the shellfish project for the Nanwalek, Port Graham,
Port Chatham and Dogfish Bay areas.

Please consider our needs! We would
to keep and restore our subsistence ways.

We also would like to provide jobs for
the people in our communities.

Thank you.

Emilie Sweeney - Council Member

Page (1) of (2) pages

93325087 Carol KVASNIKoff
P.O. Box 806
Nanawake, AK 99501

19 November 1992

Exxon Valdez Oil Spill

Public Information Center

645 G. Street

Anchorage, AK 99501

Dear Trustee Council Member,

This letter is in regards to restoring some of the traditional subsistence area that were impacted or destroyed by the Exxon Valdez Oil Spill in the Chugach Region. I understand there is money available to help restore some of the fisheries. As no amount of money can replace what has already been lost or damaged, help to restore the fisheries can help us to start enjoying and subsisting on foods that were here before. And no money can replace the fear that people has had of eating foods that was impacted by the oil spill, a man made disaster.

But by trying to restore the fisheries in our areas, maybe life will have a chance to get back to the way it was and to pass on the traditional ways once again, ways that has always been so important. Maybe in some way it will ease the pain that we all have endured see our environment, foods and way of life changed.

Carol Kuasnickoff
P.O. Box 8006
Nauyasak, AK 99603

This is why I support Chugachmiut, 3300 "C" St. Anchorage, AK, 99503; Natural Resource Department is seeking funding from the Exxon Valdez Oil Spill Restoration Fund. The following projects are all important in restoring and building the Mariculture in the Chugach Region. The projects are as follows: 1:

- ① Chugach Region Mariculture Project (93019), It
- ② The Bivalve Shellfish Hatchery and Research Center (93020)
- ③ Subsistence Restoration Project (93017)
- ④ I also would like to support two additional projects in our areas.

(A) Clam restoration on Passage Island, Port Graham, Nauyasak, Port Clatsam, or Dagfish Bay.

(B) Nauyasak ^{Salmon} Seakey Enhancement Program.

With the support of monies from the Exxon Oil Spill Restoration Fund, we can become self sustaining as we all work together to reach this goal. We urge you to help support our projects.

Sincerely,

Carol Kuasnickoff
P.O. Box 8006
Nauyasak, AK 99603

93325088

November 20, 1992

James R. Krasnickoff
Box 8006
Nanwalek, Alaska 99603

Exxon Valdez Oil Spill
Public Information Center
645 "C" Street
Anchorage, Alaska

Dear Trustees Council members,

I am a resident of Nanwalek, and I am writing to you in regards of supporting Chugachmiut Natural Resource Department in obtaining restoration funds for a possible clam bed on Passage Island or in Dog Flat Bay.

Since the Oil Spill I had lost confidence with gathering my native foods, I feel the same way today, but I am trying to gain it back. It is not the same anymore, but if we receive funds to plant clams, maybe my confidence will come back. This is very important, and we are relying on you for this purpose.

Please consider my letter of support, your funds will help us get some of our subsistence foods back.

Thank You,
James Krasnickoff

93325089
(Tatitick)

Egon Valdez Oil Spill
645 G. Street
Anchorage, AK

Dear Sirs,

I have been
hunting and fishing
all my life. I
couldn't believe the
destruction that the
Valdez Oil Spill caused
to the birds and animals
in Prince William Sound.

I hope you find
out from the letters
that we local people
are writing that we
are and were affected
by the Oil Spill more
than any one else.

We could use this
funding from the
settlement to help the
Oyster project and the

Bivalve Shell fish hatchery
and also for other
projects which will
directly help our village.

Thank you,
Norman H. Klassoff

93325090 Nov. 9, 92

Epson Valdez Oil Spill Trustee Council
645 G Street
Anchorage, Alaska, 99501

Dear Trustee Council Member,

I have been living here in Tatitlek now for 13 years. I moved here from Cordova after I married my husband Norman (Middy) Vlasoff.

My family are all commercial fishermen and I was raised to live off the land smoking salmon and putting up all of Gods bounty for people who live here in Prince William Sound.

I had had a confidence in our way of life that no urban

person living off the
supermarkets of the
city could under-
stand. We have to
hunt and fish and
store up what we get
from the land. We
don't have the luxury
of just running down
to the store to replenish
our supply. Sometimes
we can't even get to
town for supplies in
the winter because of
storms ect.

Our lives are dependent
on what God provides to
the hunters and their
charity for the extended
families here in Tatitlek
and also those who
no longer live here but
have moved to the cities.
It is a priviledge to live
this way of life.

I can't put into words how much the Valdez Oil Spill grieved my heart. All I can compare it to what the Jewish people must have felt to see their families die before their eyes.

Economically we are still being affected since most of our families are fishing every year all their life. Since the Oil Spill the price for pink salmon has bottomed out and some people here locally stand to loose their fishing boats. That's why this Oyster Farm Project is so important to our local economy. The Chugach Region Mariculture Project (93019)

and the Bivalve Shellfish Hatchery and Research Center (93020) are very important to us as we employ so many local people from the Alutiq Pride Oyster Farm and the people have year around jobs. The Bivalve Shellfish Hatchery is needed so we don't have to send for oyster spat from Washington and California and is good for the whole state of Alaska, besides benefiting us here in Chugach Region.

In closing I would like to Thankyou for your support of othr people here in Prince William Sound. I'm sorry I didnt send my opinion s in before the time but I

hope you help us
here in the village
as we are the people
who are the most
affected by the oil
spill and every thing
the oil spill has
caused here.

Sincerely
Martha Vlasoff
Box 122
Tat, +lek AK
99677

November 9, 1992

Effron Valley Oil Spill Public Information Center
645 G Street
Anchorage, Alaska 99501

Dear Trustee Council Member;

I work for the Iñupiat Maritime Project in Iñupiat and request that the funding for this project be continued. We have a quality product and we're proud of our endeavors in producing it.

Because of the oil spill, we've been affected both economically & culturally. We feel that we deserve a portion of the restoration monies because our subsistence funds have been taken away and our fishing jobs gone.

The Chugach Region Maritime Project (93019) & the Gwich'in Shalefish History & Research Center (93020) are very important to us if not vital. We depend on these projects for job opportunities in our villages, because there are very few job openings. We urge you to help support these projects.

We also support the Subsistence Restoration Project (93017) Habitat use, Behavior & Monitoring of Harbor Seals in the Prince of Wales Sound (93046) & Chonaga Chinook & Coho Salmon Release Program (93016).

Sincerely,

Claren Allen

Box 128

Barrow, Alaska 99677

93305092

NOV. 9, 1992

Dear Trustee;

I am currently a resident of
Tatitlek Community

I feel our village & the environment has been destroyed due to the Exxon Oil Spill..... Our local wild-life is slowly deteriorating..... Not to mention "Commercial fishing" which is at its lowest ever..... Meaning "no jobs".

We feel we deserve a portion of the restoration money due to our shell-fish beds being destroyed, and our subsistence foods taken away.

The Chug. Reg. Mariculture Pro. (93019) and the Bivalve Shellfish Hatchery & Res. Center (93020) are very important to us. We are working for our project to be self-sustaining & are counting on this money to reach this point. We urge you to help support our project.

Sincerely,
Regina & Bob Christmas

93325093
Nov 9 - 1992

Dear Trustee Council Member

I live and work in Tatitlek I am a worker for the Tatitlek Mariculture Project and would like the funding of this project be continued. Working on this project is very educational and self rewarding because of our commitment to this project to self sufficient. Starting from what we were left with from the oil spill was not easy but this is something we are doing for ourselves and producing a quality product. Our village has been affected by the oil spill economically and culturally. We feel we deserve a portion of the restoration money due to our shellfish beds being destroyed subsistence foods taken away and our fishing jobs vanishing until who knows when.

The Chugach region Mariculture Project and the Bivalve Shellfish Hatchery and research center are very important to us. There are very few jobs nutritious and give us a taste of some of our subsistence foods which were lost due to the oil spill.

We are working for our project to be self-sustaining
and are counting on this money to reach this point

We urge you to help support our projects.

We also support these projects: Subistence Restoration
Project, Habitat use, Behavior, Monitoring of Harbor Seals
in the Prince William Sound and Chinook salmon
and Coho Salmon Release Program.

Sincerely
Dale C. Iversen

11-10-92

Exxon Valdez oil spill public information
 C-45-B St.

Anchorage - Al - 99501

Dear Trustee Council member -

I live here in Tatitleh for the last 20 yrs -
 I was here when the oil spill happen just 5 miles away
 from here = I watched what's happenin to our subsistence
 foods not only to our subsistence foods but to our life
 style = our commercial fishing has been destroyed our
 trails have gone = we have boys that look like old
 men - ~~now~~ so our people are suffering from that
 oil spill = all our young people that want to make
 their homes here = can't because they can't make a living.
 We're trying to build some thing here for the future
 The moriculture is very important to our future

Sincerely
 Doris Kump Hoff
 Tatitleh, Al.

Nov 9th, 1992

Dear Trustee Council,

I am an elder in the village of Tatitlek and our village was heavily impacted by the Oil Spill, both economically & culturally. We feel we deserve a portion of the restoration money due to our shellfish beds being destroyed, subsistence foods taken away, and our fishing jobs vanishing until who knows when.

The Chugach Region Mariculture Project (93019) & The Bivalve Shellfish Hatchery & Research Center (93020) are very important to us. There are very few jobs & these projects present job opportunities for our village. Further, the oysters are nutritious & give us a taste of some of our subsistence foods which were lost due to the oil spill.

We are working for our project to be self-sustaining & are counting on this money to reach this point. We urge you to help support our projects.

Sincerely,
Edward S. Megoroff

93325096
(Tatitlek)

Nov. 9, 1992

Dear Trustee Council Member

I am writing this letter on concerns for the oyster projects we are doing in Tatitlek. If we don't get the help from the oil spill money we may not make it. Being as the spill effected our resource of food we need something to make up for it. We need the jobs for the community to put food on the table and clothes on our kids.

The Chugach Region Mariculture Project (93019) and The Bivalve Shellfish Hatchery and Research Center (93020) are very important to us. There are very few jobs and these projects present job opportunities for our village. Further the oysters are nutritious and give us a taste of some of our subsistence foods which were lost due to the oil spill.

We are working for our project to be self-sustaining and are counting on this money to reach this point. We urge you to help support our project.

We also support these projects Subsistence Restoration Project (93017) Habitat Use, Behavior & Monitoring of Harbor Seals in Prince William Sound (93046) & Chenega Chinook & Coho Salmon Release Program (93016).

Sincerely
Elizabeth A Hunt

93325097
(Tatitlek)

Karen Zacher -
Tatitlek Mariculture Work
Box 116
Tatitlek, AK 99677

Nov. 10, 1992

Exxon Valdez Oil Spill Public Information Center
645 "G" Street
Anchorage, AK 99501

Dear Trustee Council Member:

Since my family was relocated to Tatitlek after the "64" earthquake, I've lived here and worked on parttime jobs. I am currently working for the Tatitlek Mariculture Project. In order for us to make this project successful - we need help with funding.

The Valdez Oil Spill has made a definite impact on us economically and culturally. It all but wiped out our fishing industry and other seafoods that we subsist on. We feel that you can allot us a portion of your restoration money in order to keep our aquaculture project going fulltime.

93325098
(Tatitlek)

Pg. 2.

The Tatitlek Mariculture Project is producing quality oysters and has provided much needed jobs. Please consider our request for funding.

Sincerely,
Karen Zacher

November 4, 1992

93325099
(Tat. Hek)

Exxon Valdez Oil Spill Public Information Center
645 "G" Street
Anchorage, AK 99501

Dear Trustee Council Member:

I live and work in Tatitlek. I am a worker for the Tatitlek Mariculture Project and would like the funding of this project be continued. Working on this project is very educational and self rewarding because of our commitment to this project to become self sufficient. Starting from what we were left with from the oil spill was not easy but this is something we are doing for ourselves and producing a quality product.

Our village has been affected by the Oil Spill economically and culturally. We feel we deserve a portion of the restoration money due to our shellfish beds being destroyed, subsistence foods taken away, and our fishing jobs vanishing until who knows when.

The Chugach Region Mariculture Project (93019) and The Bivalve Shellfish Hatchery and Research Center (93020) are very important to us. There are very few jobs and these projects present job opportunities for our village. Further, the oysters are nutritious and give us a taste of some of our subsistence foods which were lost due to the oil spill.

We are working for our project to be self-sustaining and are counting on this money to reach this point. We urge you to help support our projects.

We also support these projects: Subsistence Restoration Project (93017), Habitat Use, Behavior, & Monitoring of Harbor Seals in the Prince William Sound (93046), & Chenega Chinook and Coho Salmon Release Program (93016).

Sincerely,
YOUR NAME

Betty J. Totemoff

93325100
(Tatitlek)

Nov. 8, 1992

Dear Trustee Council Member

I am a resident of Tatitlek. In 1959 The Valdez Exxon Oil Spill has left us in a very tight spot. We count on the substance very much. And due to the oil spill we don't get as much because most of ~~them~~ the wild life has been destroyed. Please help to support us in this matter.

Sincerely,

[Signature]

11/01/92

93325101
(Tatitlek)

Dear Exxon Valdez trustee Council...

Since the Exxon oil spill there was less fish with less fish there was less jobs, since mariculture there was more jobs for more villages. more villages have more money. The oil spill hurt us ~~and~~ in subsistence fishing. Jobs we ate cereal a lot from Exxon but thanks for providing food for us. It killed a lot of animals. Are village needs jobs.

Sincerely

Arthur Kompkoff

93325102
(TatiHeK)

11/9/92

Dear Exxon Valdez Trustee Council,

This oil spill has effected our community
really bad. How our animals were killed and we, us
were out of our wildmeats we need our meat
and Yes I do, we do support our oyster farm.

From,
Anna Gregoriuff

Feb

Dear Exxon Valdez trustee council the
oil spill has effected my life and
others around me. My life has changed
in many ways, the wild life isn't
like it was. the deer aren't here like
they were six years ago and the
fish even the birds aren't here like
they were then.

I suport the chugach Region
village mariculture project because
I will need money for college
and lots of other things.

Feb m. Komscoff III

93325/04
(Tatitlek)

Dear Exxon Trustee Council
we would like your help on
what the oil spill has done
to the environment and or village
it killed all the animals like
fish when the oil spill happened their
was a poor fishing year when that
happened and the prices of fish dropped
and the boats all of down here they
could not even pay off their bills for
the summer. and it killed off many
sources of animals like sea otter,
seal, sea lion, ducks, geese,
seagulls, and I hardly see these
animals around I see some of them
but not all of them, so we would
like your help and the village would
like it to.

Thank's
Allen
Riffe

93325105
(Tatitlek)

11-9-92

Dear Exxon Valdez Trustee Council,

I think the oil spill really affected
this village by killing most of the animals
we hunt and make money.

Bobby Gette

Dear Exxon Valdez Trustee Council,

I think the EXXON oil spill effected us by killing all the animals that we eat. I think thats the only way it effected us because the Island was blocking the oil from coming into our village. And the wind blew it into Chenega. But when it hit Chenega it effected them from going swimming and they weren't able to eat any sea food for awhile either.

From
Renee.

Deber, Exxon Valdez Trustee Council

The oil spill effected our family
we are fisher man and we
have been fishing for 5 years
and the oil have shut down
fishing for a few years.

I think the oysters should
stay so some of the people
could have jobs to get
money so they could support
there family.

Sincerely yours

Duke Anderson

Dear EXXon Valdez Trustee Council, 11-9

The oil spill effected us by Killin most of our animals. And it effected my family. Now did it effect my family? my Parents were in and out of our house. The Year of 1989 I missed my Parents alot. when I walked down the beach I saw thick black stuff on the Rocks. The oil spill effected the environment, the comitee. The important People.

From,
Jenny Selanoff

93325109
(TatitHeK)

11/9/92

Dear Exxon Valdez trustee council,

The oil spill effected us in
alot of ways. It took away alot
of the animals that we eat and
hunt. It also effected more body's
then ours. It effected the animals
the most. From then the village has
an oyster farm it helps with our
jobs and with the money. We feel
that we need the Oyster Farm for
the future kids.

We Support the oyster farm.

Marcia Tolomeff

11/9/9

Dear Exxon Valdez Trusty Council,

I think Tatitlek was affected
majorly by your oil spill in '89.
We couldn't get our subsistence
foods, such as seals, Chums, deer
and ducks. I think we need
the Grant for mari culture. I
think it's the least you can do,
Thank you.

Ferry Selanoff Jr.

11-9-92

DEAR EXXON VALDEZ TRUSTEE COUNCIL

The Oil Spill really effected
this hole village because over half
of the animals are totally gone
but I wish the stupid oil spill never
even happened. It is all Exxon
Valdez's fault nobody else's
fault but Exxons and that Hazelwood
who you guys didn't even check if he
was drinking you don't know how ha
it is in the small villages. So you go
to find out how it effected us.

From
FRANKOMPKOFF

93325/12
(tatitlek)

Dear Exxon Valdez Trustee Council,

NOV. 9, 1992

The oilspill affected us by killing most of our animals. We weren't able to eat sea otters, clams, cockles and other animals from the sea. It effected our parents alot. My parents were always being called out. How it effected our community by too many people from all over came to interview us. We didn't like it very much.

From
Nelly Thomphoff

11/9/1992
93325113
(Tatitlek)

Oyster

Oyster

Dear Trustee Council

Hi my name is Angela Kay Totemoff and I'm 10. and in 5 grade
when the oil spill happened it killed
a lot of the animals and people lost jobs
people can't hunt because of the oil spill
it also affected us some people got sick
and there was no more fishing for a long time

I like to eat oysters and

We support the oyster farming
project

Oyster

Sincerely

Angela Kay Totemoff

11-9-92 Brandon we support the oyster farming

I like oyster

Dear Trustee Council.
Because of the oil spill we couldn't go swimming.
and we couldn't go skiff riding.
and it killed all the animals.
no more fishing jobs.
and no more seafoods.
and no more hunting.

93325114
(Tatitlek)

Dear, Trustee Council

Because of the oil spill there was no sea food. Lots of are parents had to go away. And we had to stay with different people. We could not swimming. We could not eat animals. No skifrideing. It lost lots of jobs. Nobody could go hunting. I'm in 3rd grade. We support the oyster farming project.

Tanya



November 1992

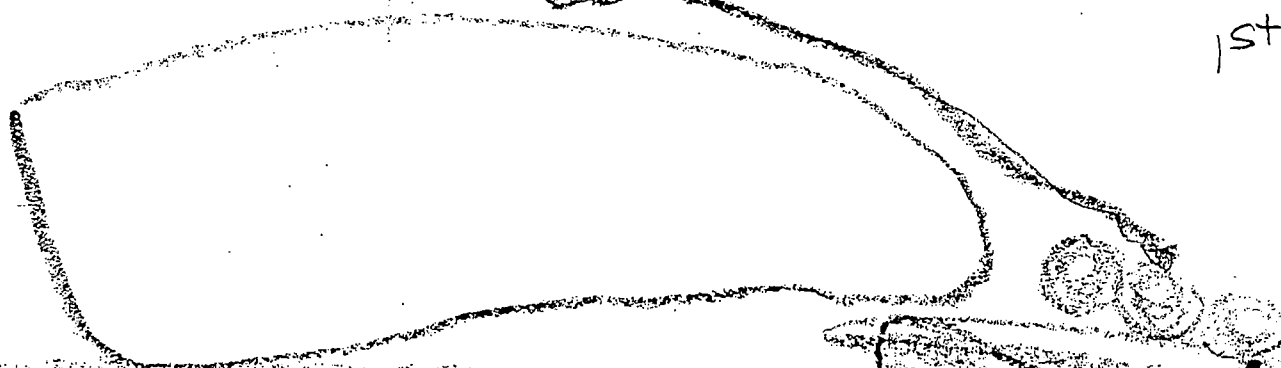
93325116
(Tatitlek)

Dear Trystee

Because of the oil spill my dad had to go away for a long time.

I support the oyster farming project.

Glenn
Christmas
1st grader.



November 9, 1992 11-9-92

Devon

933251
Ctattlek

Dear Trustee council I Like you to
give Sam manny to 2nd grade
I Love eating ^{us} busters

Sincerely,

Devon Totemoff



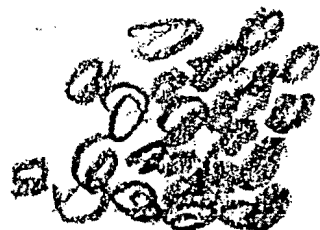
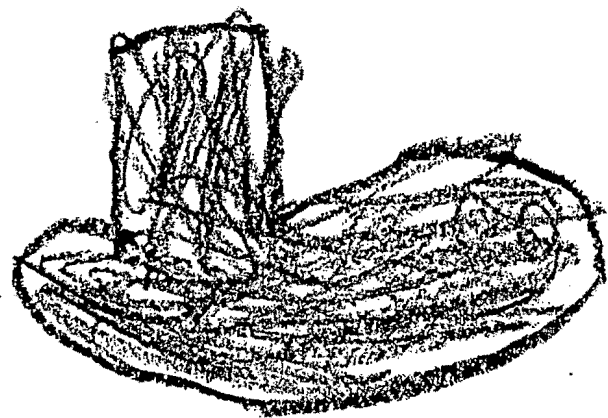
More m, beka 14 92

93325118
(tatitlek)

Dear Trustee Community,

Because of the oil spill I
couldn't swim and I couldn't
go boat riding. We support
the oyster farming project,

MELISSA ANN + stem of a
1st grader



11-9-92

93325119
(Tatitlek)

Dear Trustee Council

Because of the Oil spill I Couldn't
Swim any more. I hardly get any
Seafood. It killed alot of the
animals. We hardly get any fish.
We support the Oyster farming project

Sincerely,

Ell

Totemoff

Dear Trustee Council,

When the oil affected all around our village. And it affected the animals. Some of our Parents had to go out on a boat. We Couldn't go swimming anymore we couldn't have any more Seafood. It made me very sad. The Oysters are very good. We Support the Oyster farming Project.

Sincerely,
Nanci Kompson

NOV. 9th 1992

93325/21
(tatitlek)

Dear Trustee Council

I like the seafood.

My Daddy have to leave us for long
Time, to work on the Oil Spill. It was
No fun, when we couldn't swim. It
hard to get any sea food now.

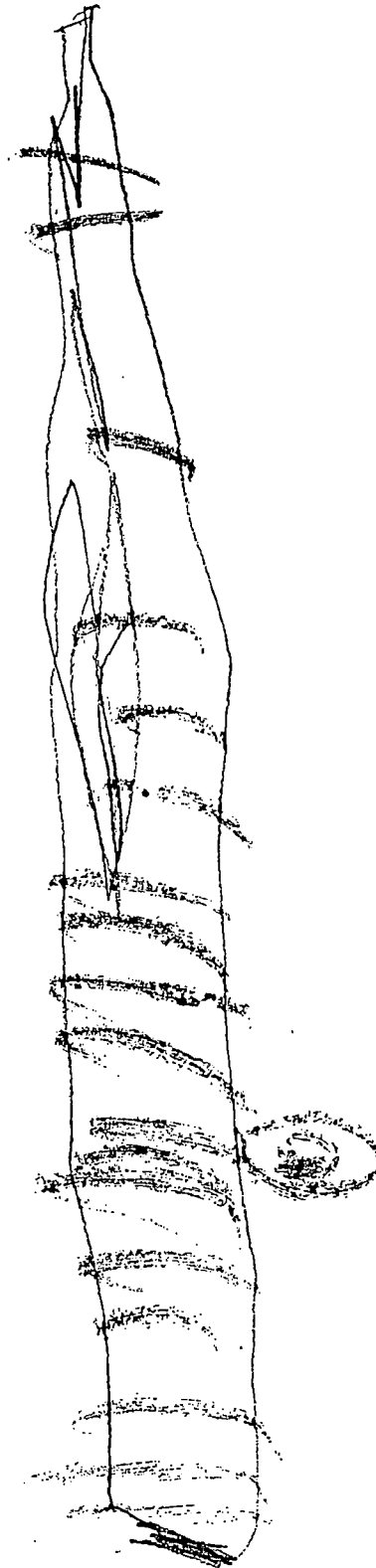
We support oysters
farming. we love oysters

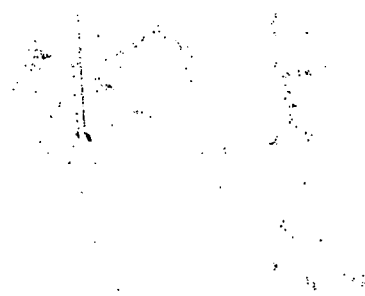
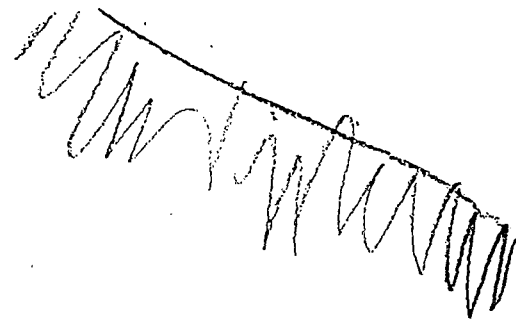
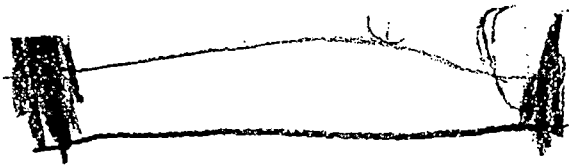
RAM^g

Kerrt

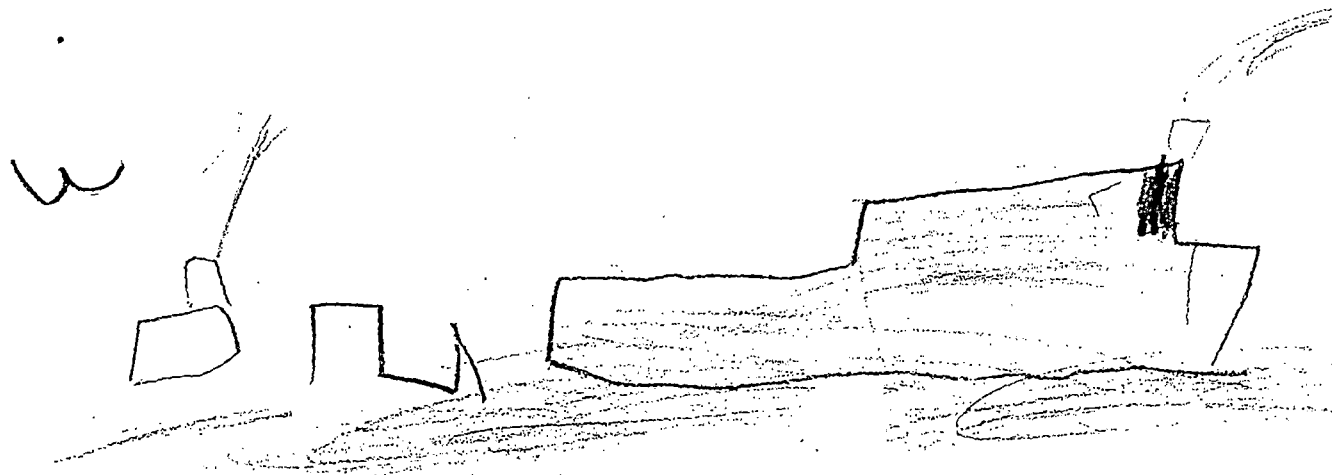
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93325122
(Tatitlek)





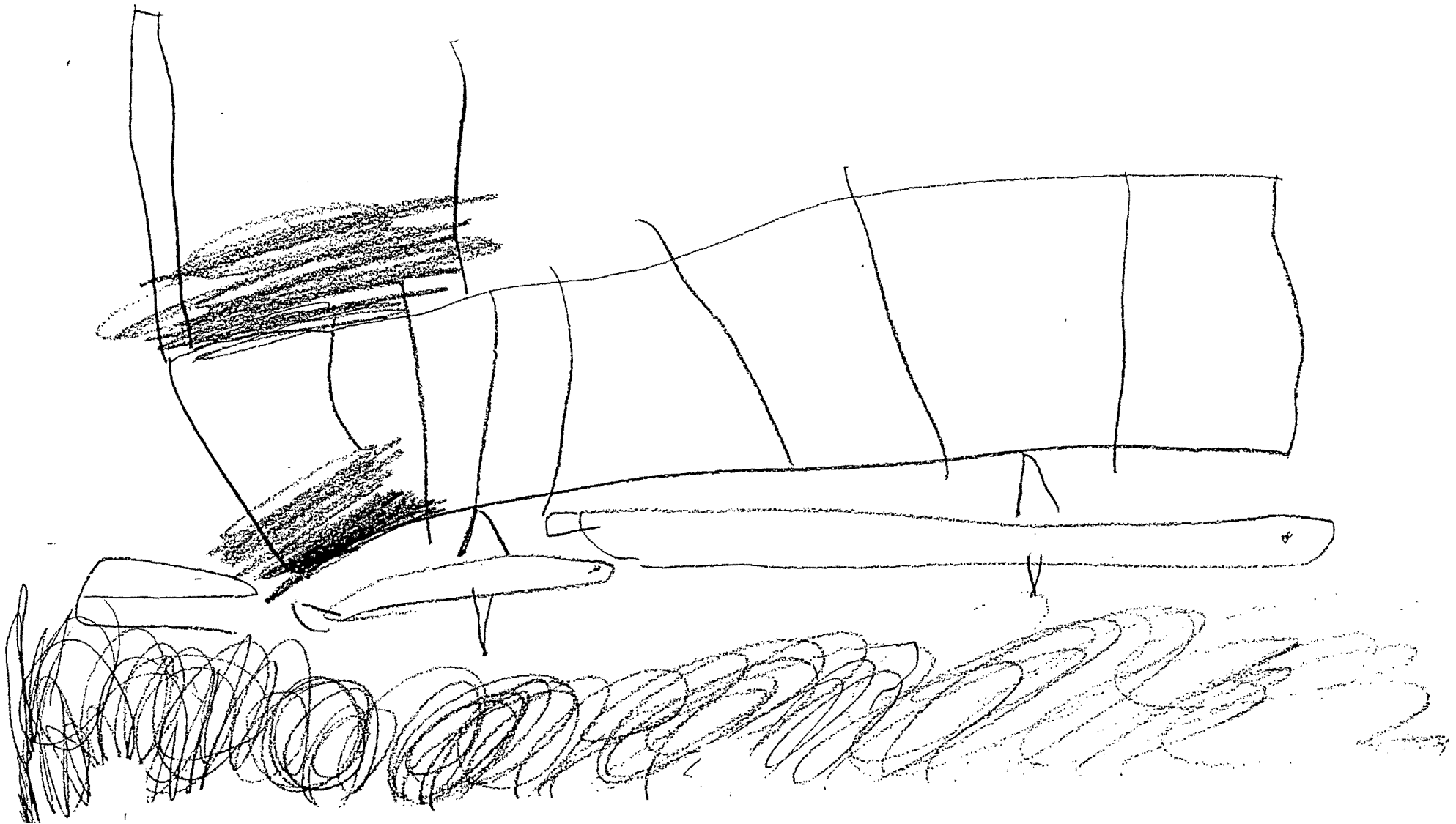
RAIN



mmmm

DE

kerx



11-9-92
StatHek

Dear. Tustee Council:

I am writing to you about
the oil spill. I was not living
in the state of Alaska at
the time of the oil spill but
I know what happend; Some of

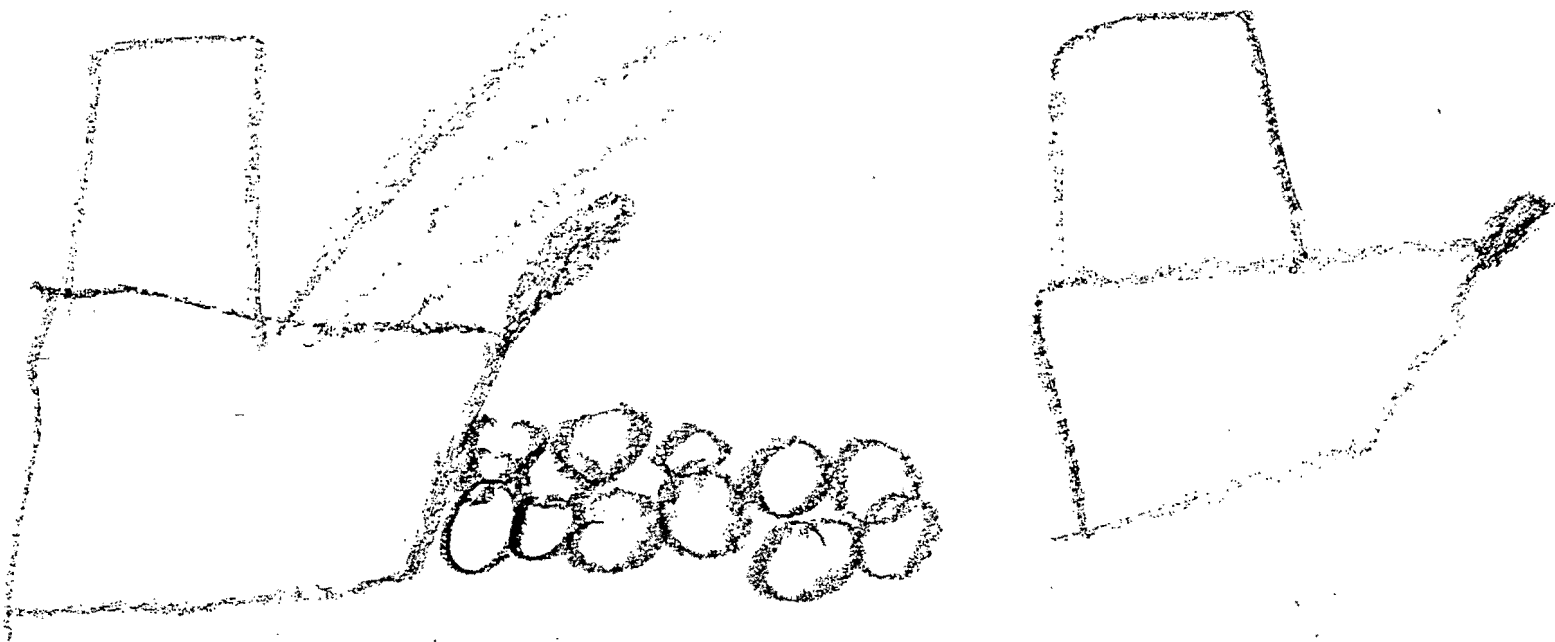
the animals died. I like to eat
oysters that they grow here
at the cyster farm. That why
support the cyster farm.

Sincerely,

Ean

November 4 14 X2
DEON TSTEE COUNCIL

(Tatitiek) We support the oyster farming
project. Because of the oil we couldn't
go fishing. We couldn't go swimming.
GREGORY FANGS WU MARIE VELLE



93325125

November 9, 1992

Exxon Valdez Oil Spill Settlement Trustee Council
645 G Street
Anchorage, AK. 99501

Dear Sirs:

I am a resident of the Village of Tatitlek, which is located in Prince William Sound, just four miles from Bligh Reef, where the Exxon Valdez ran aground. Our village has been impacted heavily by the oil spill both economically and culturally, and we feel that we deserve a portion of the oil spill restoration funds because our subsistence resources have been severely damaged, our commercial fishing jobs that we depend on so heavily for our annual incomes are questionable and our shellfish beds have been drastically affected.


Recently, our village began an oyster farming operation, with funding provided by the Tatitlek Mariculture Project. Our goal for this project is to make it self-sustaining, so that it may provide long term employment opportunities for our residents and to provide an alternate subsistence resource for the many resources that have been damaged by the oil spill. The Chugach Region Mariculture Project (93019) and the Bivalve Shellfish Hatchery & Research Center (93020) are essential in order for us to reach our goal of having a self-supportive project that will serve our community for generations to come.

We are also supportive of the following projects: Subsistence Restoration Project (93017), Habitat Use, Behavior, & Monitoring of Harbor Seals in Prince William Sound (93046) and the Chenega Chinook & Coho Salmon Release Program (93016)

We urge the support of the above listed projects, they mean so much to our community, both culturally and economically.

Thank you very much.

Sincerely,


Roselene Vlasoff

P.O. Box 124

Tatitlek, AK. 99677

Post-It [®] brand fax transmittal memo 7871		# of pages ▶ 1
To <i>Evelyn T. ...</i>	From <i>Sandra Selanai</i>	
Co. <i>Tatitlek, AK</i>	Co. <i>Tatitlek, AK</i>	
Dept.	Phone # <i>325-</i>	
Fax #	Fax #	

985-5126

November 9, 1992

Exxon Valdez Oil Spill Settlement Trustee Council
645 G Street
Anchorage, AK. 99501

Dear Sirs:

I am a resident of the Village of Tatitlek, which is located in Prince William Sound, just four miles from Bligh Reef, where the Exxon Valdez ran aground. Our village has been impacted heavily by the oil spill both economically and culturally, and we feel that we deserve a portion of the oil spill restoration funds because our subsistence resources have been severely damaged, our commercial fishing jobs that we depend on so heavily for our annual incomes are questionable and our shellfish beds have been drastically affected.

Recently, our village began an oyster farming operation, with funding provided by the Tatitlek Mariculture Project. Our goal for this project is to make it self-sustaining, so that it may provide long term employment opportunities for our residents and to provide an alternate subsistence resource for the many resources that have been damaged by the oil spill. The Chugach Region Mariculture Project (93019) and the Bivalve Shellfish Hatchery & Research Center (93020) are essential in order for us to reach our goal of having a self-supportive project that will serve our community for generations to come.

We are also supportive of the following projects: Subsistence Restoration Project (93017), Habitat Use, Behavior, & Monitoring of Harbor Seals in Prince William Sound (93046) and the Chenega Chinook & Coho Salmon Release Program (93016)

We urge the support of the above listed projects, they mean so much to our community, both culturally and economically.

Thank you very much.

Sincerely,

Charles & Katie Selznoff
P.O. Box 125
Tatitlek, AK. 99677

Charles W. Selznoff *Pr.*
Kathryn Selznoff

Post-It™ brand fax transmittal memo 7871		# of pages → 2
To <i>Evelyn Juliusen</i>	From <i>Sandra Selznoff</i>	
Co. <i>Tatitlek-ORF</i>	Co. <i>Tatitlek-ORF</i>	
Dept.	Phone #	<i>325-2311</i>
Fax #	Fax #	<i>325-0378</i>

98225/27

November 9, 1992

Exxon Valdez Oil Spill Settlement Trustee Council
645 G Street
Anchorage, AK. 99501

Dear Sirs:

I am a resident of the Village of Tatitlek, which is located in Prince William Sound, just four miles from Bligh Reef, where the Exxon Valdez ran aground. Our village has been impacted heavily by the oil spill both economically and culturally, and we feel that we deserve a portion of the oil spill restoration funds because our subsistence resources have been severely damaged, our commercial fishing jobs that we depend on so heavily for our annual incomes are questionable and our shellfish beds have been drastically affected.

Recently, our village began an oyster farming operation, with funding provided by the Tatitlek Mariculture Project. Our goal for this project is to make it self-sustaining, so that it may provide long term employment opportunity for our community and as possible an alternative resource for the many resources that have been damaged by the oil spill. The Chugach Region Mariculture Project (93019) and the Bivalve Shellfish Hatchery & Research Center (93020) are essential in order for us to reach our goal of having a self-supportive project that will serve our community for generations to come.

We are also supportive of the following projects: Subsistence Restoration Project (93017), Habitat Use, Behavior, & Monitoring of Harbor Seals in Prince William Sound (93046) and the Chenega Chinook & Coho Salmon Release Program (93016)

We urge the support of the above listed projects, they mean so much to our community, both culturally and economically.

Thank you very much.

Sincerely,

Kenneth W. Delanoff

73305128

November 9, 1992

Exxon Valdez Oil Spill Settlement Trustee Council
645 G Street
Anchorage, AK. 99501

Dear Sirs:

I am a resident of the Village of Tatitlek, which is located in Prince William Sound, just four miles from Bligh Reef, where the Exxon Valdez ran aground. Our village has been impacted heavily by the oil spill both economically and culturally, and we feel that we deserve a portion of the oil spill restoration funds because our subsistence resources have been severely damaged, our commercial fishing jobs that we depend on so heavily for our annual incomes are questionable and our shellfish beds have been drastically affected.

Recently, our village began an oyster farming operation, with funding provided by the Tatitlek Mariculture Project. Our goal for this project is to make it self-sustaining, so that it may provide long term employment opportunities for our residents and to provide an alternate subsistence resource for the many resources that have been damaged by the oil spill. The Chugach Region Mariculture Project (93019) and the Bivalve Shellfish Hatchery & Research Center (93020) are essential in order for us to reach our goal of having a self-supportive project that will serve our community for generations to come.

We are also supportive of the following projects: Subsistence Restoration Project (93017), Habitat Use, Behavior, & Monitoring of Harbor Seals in Prince William Sound (93046) and the Chenega Chinook & Coho Salmon Release Program (93016)

We urge the support of the above listed projects, they mean so much to our community, both culturally and economically.

Thank you very much.

Sincerely,

Robert Christman

93315/29

November 9, 1992

Exxon Valdez Oil Spill Settlement Trustee Council
6455G Street
Anchorage, AK. 99501

Dear Sirs:

I live and work in the Village of Tatitlek in Prince William Sound, just four miles from Bligh Reef, where the Exxon Valdez ran aground. Our village has been impacted by the oil spill both economically and culturally. We feel very strongly that we are entitled to a portion of the oil spill restoration funds due to our subsistence resources being severely impacted, our commercial fishing jobs (that we depend on heavily for our annual incomes) being questionable indefinitely, and our shellfish beds being drastically affected.

I am an employee of the Tatitlek Mariculture Project and would like funding for this project to be continued. Our goal for this project is to make it self-sustaining so that it may provide long term employment opportunities in our village, and to provide an alternate subsistence resource for the resources that have been damaged by the oil spill. Funding of the Chugach Region Mariculture Project (93019) and the Bivalve Shellfish Hatchery & Research Center (93020) is: essential for us to reach this goal.

Please support the funding of the Chugach Region Mariculture Project and the Bivalve Shellfish Hatchery & Research Center Project, they mean very much to our village.

We also support the Subsistence Restoration Project (93017), the Habitat Use, Behavior, & Monitoring of Harbor Seals in FWS (93046) and the Chenega Chinook and Coho Salmon Release Program (93016).

Thank you very much.

Sincerely,

Brian Zacher
Brian Zacher
P.O. Box 116
Tatitlek, AK. 99677

9325130

November 9, 1992

Exxon Valdez Oil Spill Settlement Trustee Council
 645 G Street
 Anchorage, AK. 99501

Dear Sirs:

I am a resident of the Village of Tatitlek, which is located in Prince William Sound, just four miles from Bligh Reef, where the Exxon Valdez ran aground. Our village has been impacted heavily by the oil spill both economically and culturally, and we feel that we deserve a portion of the oil spill restoration funds because our subsistence resources have been severely damaged, our commercial fishing jobs that we depend on so heavily for our annual incomes are questionable and our shellfish beds have been drastically affected.

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We are also supportive of the following projects: Subsistence Restoration Project (93017), Habitat Use, Behavior, & Monitoring of Harbor Seals in Prince William Sound (93046) and the Chenega Chinook & Coho Salmon Release Program (93016)

We urge the support of the above listed projects, they mean so much to our community, both culturally and economically.

Thank you very much.

Sincerely,

Dennis P. Zacher

Dennis Zacher
 P.O. Box 118
 Tatitlek, AK. 99677

Post-It™ brand fax transmittal memo 7671		# of pages ▸ 3
To <i>Evelyn Olinsson</i>	From <i>Sandra Selanoff</i>	
Co. <i>I faxed more</i>	Co. <i>did you receive</i>	
Dept. <i>them or? Call me if you didn't.</i>	Phone # <i></i>	
Fax # <i>About 15 or so</i>	Fax # <i>others - Sandra</i>	

93325/31

November 9, 1992

Exxon Valdez Oil Spill Settlement Trustee Council
645 G Street
Anchorage, AK. 99501

Dear Sirs:

I am a resident of the Village of Tatitlek, which is located in Prince William Sound, just four miles from Bligh Reef, where the Exxon Valdez ran aground. Our village has been impacted heavily by the oil spill both economically and culturally, and we feel that we deserve a portion of the oil spill restoration funds because our subsistence resources have been severely damaged, our commercial fishing jobs that we depend on so heavily for our annual incomes are questionable and our shellfish beds have been drastically affected.

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We are also supportive of the following projects: Subsistence Restoration Project (93017), Habitat Use, Behavior, & Monitoring of Harbor Seals in Prince William Sound (93046) and the Chenega Chinook & Coho Salmon Release Program (93016)

We urge the support of the above listed projects, they mean so much to our community, both culturally and economically.

Thank you very much.

Sincerely,

.; Curtis & Katherine Kompkoff
P.O. Box 146
Tatitlek, AK. 99677

Curtis Kompkoff
Katherine Kompkoff

11/17/92

November 9, 1992

Exxon Valdez Oil Spill Settlement Trustee Council
645 G Street
Anchorage, AK. 99501

Dear Sirs:

I am a resident of the Village of Tatitlek, which is located in Prince William Sound, just four miles from Bligh Reef, where the Exxon Valdez ran aground. Our village has been impacted heavily by the oil spill both economically and culturally, and we feel that we deserve a portion of the oil spill restoration funds because our subsistence resources have been severely damaged, our commercial fishing jobs that we depend on so heavily for our annual incomes are questionable and our shellfish beds have been drastically affected.

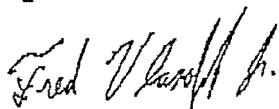
Recently, our village began an oyster farming operation, with funding provided by the Tatitlek Mariculture Project. Our goal for this project is to make it self-sustaining, so that it may provide long term employment opportunities for our residents and to provide an alternate subsistence resource for the many resources that have been damaged by the oil spill. The Chugach Region Mariculture Project (93019) and the Bivalve Shellfish Hatchery & Research Center (93020) are essential in order for us to reach our goal of having a self-supportive project that will serve our community for generations to come.

We are also supportive of the following projects: Subsistence Restoration Project (93017), Habitat Use, Behavior, & Monitoring of Harbor Seals in Prince William Sound (93046) and the Chenega Chinook & Coho Salmon Release Program (93016)

We urge the support of the above listed projects, they mean so much to our community, both culturally and economically.

Thank you very much.

Sincerely,



Fred Vlasoff Jr.
Box 140
Tatitlek, Alaska 99677

93325133

November 9, 1992

Exxon Valdez Oil Spill Settlement Trustee Council
645 G Street
Anchorage, AK. 99501

Dear Sirs:

I am a resident of the Village of Tatitlek, which is located in Prince William Sound, just four miles from Bligh Reef, where the Exxon Valdez ran aground. Our village has been impacted heavily by the oil spill both economically and culturally, and we feel that we deserve a portion of the oil spill restoration funds because our subsistence resources have been severely damaged, our commercial fishing jobs that we depend on so heavily for our annual incomes are questionable and our shellfish beds have been drastically affected.

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We are also supportive of the following projects: Subsistence Restoration Project (93017), Habitat Use, Behavior, & Monitoring of Harbor Seals in Prince William Sound (93046) and the Chenega Chinook & Coho Salmon Release Program (93016)

We urge the support of the above listed projects, they mean so much to our community, both culturally and economically.

Thank you very much.

Sincerely,

Exenia Gregorieff
Exenia Gregorieff

P.O. Box 105

Tatitlek, AK. 99677

222-5134

November 9, 1992

Exxon Valdez Oil Spill Settlement Trustee Council
645 G Street
Anchorage, AK. 99501

Dear Sirs:

I am a resident of the Village of Tatitlek, which is located in Prince William Sound, just four miles from Bligh Reef, where the Exxon Valdez ran aground. Our village has been impacted heavily by the oil spill both economically and culturally, and we feel that we deserve a portion of the oil spill restoration funds because our subsistence resources have been severely damaged, our commercial fishing jobs that we depend on so heavily for our annual incomes are questionable and our shellfish beds have been drastically affected.

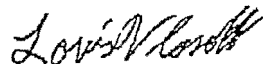
Recently, our village began an oyster farming operation, with funding provided by the Tatitlek Mariculture Project. Our goal for this project is to make it self-sustaining, so that it may provide long term employment opportunities for our residents and to provide an alternate subsistence resource for the many resources that have been damaged by the oil spill. The Chugach Region Mariculture Project (93019) and the Bivalve Shellfish Hatchery & Research Center (93020) are essential in order for us to reach our goal of having a self-supportive project that will serve our community for generations to come.

We are also supportive of the following projects: Subsistence Restoration Project (93017), Habitat Use, Behavior, & Monitoring of Harbor Seals in Prince William Sound (93046) and the Chenega Chinook & Coho Salmon Release Program (93016)

We urge the support of the above listed projects, they mean so much to our community, both culturally and economically.

Thank you very much.

Sincerely,



Louis Vlasoff
Box 124
Tatitlek, Alaska 99677

92 325/35

November 9, 1992

Exxon Valdez Oil Spill Settlement Trustee Council
645 G Street
Anchorage, AK. 99501

Dear Sirs:

I am a resident of the Village of Tatitlek, which is located in Prince William Sound, just four miles from Bligh Reef, where the Exxon Valdez ran aground. Our village has been impacted heavily by the oil spill both economically and culturally, and we feel that we deserve a portion of the oil spill restoration funds because our subsistence resources have been severely damaged, our commercial fishing jobs that we depend on so heavily for our annual incomes are questionable and our shellfish beds have been drastically affected.

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We are also supportive of the following projects: Subsistence Restoration Project (93017), Habitat Use, Behavior, & Monitoring of Harbor Seals in Prince William Sound (93046) and the Chenega Chinook & Coho Salmon Release Program (93016).

We urge the support of the above listed projects, they mean so much to our community, both culturally and economically.

Thank you very much.

Sincerely,

Roy & Evelyn Totemoff
P.O. Box 114
Tatitlek, AK. 99677

Evelyn H. Totemoff
Roy Totemoff

92325136

November 9, 1992

Exxon Valdez Oil Spill Settlement Trustee Council
6455G Street
Anchorage, AK. 99501

Dear Sirs:

I live and work in the Village of Tatitlek in Prince William Sound, just four miles from Bligh Reef, where the Exxon Valdez ran aground. Our village has been impacted by the oil spill both economically and culturally. We feel very strongly that we are entitled to a portion of the oil spill restoration funds due to our subsistence resources being severely impacted, our commercial fishing jobs (that we depend on heavily for our annual incomes) being questionable indefinitely, and our shellfish beds being drastically affected.

I am an employee of the Tatitlek Mariculture Project and would like funding for this project to be continued. Our goal for this project is to make it self-sustaining so that it may provide long term employment opportunities in our village, and to provide an alternate subsistence resource for the resources that have been damaged by the oil spill. Funding of the Chugach Region Mariculture Project (93019) and the Bivalve Shellfish Hatchery & Research Center (93020) is: essential for us to reach this goal.

Please support the funding of the Chugach Region Mariculture Project and the Bivalve Shellfish Hatchery & Research Center Project, they mean very much to our village.

We also support the Subsistence Restoration Project (93017), the Habitat Use, Behavior, & Monitoring of Harbor Seals in PWS (93046) and the Chenega Chinook and Coho Salmon Release Program (93016).

Thank you very much.

Sincerely,
Maxine Totenoff
Maxine Totenoff
P.O. Box 111
Tatitlek, AK. 99677

Post-It™ brand fax transmittal memo 7671		# of pages > 8
To: Evelyn Johnson	From: Sandra Selan	
Co:	Co: Tatitlek DPA	
Dept:	Phone #	
Fax #	Fax #	

93325137

November 9, 1992

Exxon Valdez Oil Spill Settlement Trustee Council
645 G Street
Anchorage, AK. 99501

Dear Sirs:

I am a resident of the Village of Tatitlek, which is located in Prince William Sound, just four miles from Bligh Reef, where the Exxon Valdez ran aground. Our village has been impacted heavily by the oil spill both economically and culturally, and we feel that we deserve a portion of the oil spill restoration funds because our subsistence resources have been severely damaged, our commercial fishing jobs that we depend on so heavily for our annual incomes are questionable and our shellfish beds have been drastically affected.

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We are also supportive of the following projects: Subsistence Restoration Project (93017), Habitat Use, Behavior, & Monitoring of Harbor Seals in Prince William Sound (93046) and the Chenega Chinook & Coho Salmon Release Program (93016)

We urge the support of the above listed projects, they mean so much to our community, both culturally and economically.

Thank you very much.

Sincerely,

David Totemoff Jr.

933-5138

November 9, 1992

Exxon Valdez Oil Spill Settlement Trustee Council
645 G Street
Anchorage, AK. 99501

Dear Sirs:

I am a resident of the Village of Tatitlek, which is located in Prince William Sound, just four miles from Bligh Reef, where the Exxon Valdez ran aground. Our village has been impacted heavily by the oil spill both economically and culturally, and we feel that we deserve a portion of the oil spill restoration funds because our subsistence resources have been severely damaged, our commercial fishing jobs that we depend on so heavily for our annual incomes are questionable and our shellfish beds have been drastically affected.

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We are also supportive of the following projects: Subsistence Restoration Project (93017), Habitat Use, Behavior, & Monitoring of Harbor Seals in Prince William Sound (93046) and the Chenega Chinook & Coho Salmon Release Program (93016)

We urge the support of the above listed projects, they mean so much to our community, both culturally and economically.

Thank you very much.

Sincerely,

Mike & June Totenoff
P.O. Box 103
Tatitlek, AK. 99677

June Totenoff
Mike Totenoff

92-25139

November 9, 1992

Exxon Valdez Oil Spill Settlement Trustee Council
645 G Street
Anchorage, AK. 99501

Dear Sirs:

I am a resident of the Village of Tatitlek, which is located in Prince William Sound, just four miles from Bligh Reef, where the Exxon Valdez ran aground. Our village has been impacted heavily by the oil spill both economically and culturally, and we feel that we deserve a portion of the oil spill restoration funds because our subsistence resources have been severely damaged, our commercial fishing jobs that we depend on so heavily for our annual incomes are questionable and our shellfish beds have been drastically affected.

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We are also supportive of the following projects: Subsistence Restoration Project (93017), Habitat Use, Behavior, & Monitoring of Harbor Seals in Prince William Sound (93046) and the Chenega Chinook & Coho Salmon Release Program (93016)

We urge the support of the above listed projects, they mean so much to our community, both culturally and economically.

Thank you very much.

Sincerely,

Jerry Selanoff & Sandra Selanoff

Jerry & Sandra Selanoff
P.O. Box 115
Tatitlek, AK. 99677

9232140

November 9, 1992

Exxon Valdez Oil Spill Settlement Trustee Council
645 G Street
Anchorage, AK. 99501

Dear Sirs:

I am a resident of the Village of Tatitlek, which is located in Prince William Sound, just four miles from Bligh Reef, where the Exxon Valdez ran aground. Our village has been impacted heavily by the oil spill both economically and culturally, and we feel that we deserve a portion of the oil spill restoration funds because our subsistence resources have been severely damaged, our commercial fishing jobs that we depend on so heavily for our annual incomes are questionable and our shellfish beds have been drastically affected.

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We are also supportive of the following projects: Subsistence Restoration Project (93017), Habitat Use, Behavior, & Monitoring of Harbor Seals in Prince William Sound (93046) and the Chenega Chinook & Coho Salmon Release Program (93016)

We urge the support of the above listed projects, they mean so much to our community, both culturally and economically.

Thank you very much.

Sincerely,

Lee Ann Gregorieff

Lee Ann Gregorieff

P.O. Box 110

Tatitlek, AK. 99677

92-5141

November 9, 1992

Exxon Valdez Oil Spill Settlement Trustee Council
645 G Street
Anchorage, AK. 99501

Dear Sirs:

I am a resident of the Village of Tatitlek, which is located in Prince William Sound, just four miles from Bligh Reef, where the Exxon Valdez ran aground. Our village has been impacted heavily by the oil spill both economically and culturally, and we feel that we deserve a portion of the oil spill restoration funds because our subsistence resources have been severely damaged, our commercial fishing jobs that we depend on so heavily for our annual incomes are questionable and our shellfish beds have been drastically affected.

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We are also supportive of the following projects: Subsistence Restoration Project (93017), Habitat Use, Behavior, & Monitoring of Harbor Seals in Prince William Sound (93046) and the Chenega Chinook & Coho Salmon Release Program (93016)

We urge the support of the above listed projects, they mean so much to our community, both culturally and economically.

Thank you very much.

Sincerely,
Kevin Gregorieff
Kevin Gregorieff

P.O. Box 108
Tatitlek, AK. 99677

93325142

November 9, 1992

Exxon Valdez Oil Spill Settlement Trustee Council
645 G Street
Anchorage, AK. 99501

Dear Sirs:

I am a resident of the Village of Tatitlek, which is located in Prince William Sound, just four miles from Bligh Reef, where the Exxon Valdez ran aground. Our village has been impacted heavily by the oil spill both economically and culturally, and we feel that we deserve a portion of the oil spill restoration funds because our subsistence resources have been severely damaged, our commercial fishing jobs that we depend on so heavily for our annual incomes are questionable and our shellfish beds have been drastically affected.

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We are also supportive of the following projects: Subsistence Restoration Project (93017), Habitat Use, Behavior, & Monitoring of Harbor Seals in Prince William Sound (93046) and the Chenega Chinook & Coho Salmon Release Program (93016)

We urge the support of the above listed projects, they mean so much to our community, both culturally and economically.

Thank you very much.

Sincerely,

Ron Torgnoff
Ron Torgnoff
P.O. Box 106
Tatitlek, AK. 99677

9330E142

November 9, 1992

Exxon Valdez Oil Spill Settlement Trustee Council
645 G Street
Anchorage, AK. 99501

Dear Sirs:

I am a resident of the Village of Tatitlek, which is located in Prince William Sound, just four miles from Bligh Reef, where the Exxon Valdez ran aground. Our village has been impacted heavily by the oil spill both economically and culturally, and we feel that we deserve a portion of the oil spill restoration funds because our subsistence resources have been severely damaged, our commercial fishing jobs that we depend on so heavily for our annual incomes are questionable and our shellfish beds have been drastically affected.

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We are also supportive of the following projects: Subsistence Restoration Project (93017), Habitat Use, Behavior, & Monitoring of Harbor Seals in Prince William Sound (93046) and the Chenega Chinook & Coho Salmon Release Program (93016).

We urge the support of the above listed projects, they mean so much to our community, both culturally and economically.

Thank you very much.

Sincerely,

Darlene Totemoff
P.O. Box 144
Tatitlek, AK. 99677

Darlene Totemoff

93325144

November 9, 1992

Exxon Valdez Oil Spill Settlement Trustee Council
6455G Street
Anchorage, AK. 99501

Dear Sirs:

I live and work in the Village of Tatitlek in Prince William Sound, just four miles from Bligh Reef, where the Exxon Valdez ran aground. Our village has been impacted by the oil spill both economically and culturally. We feel very strongly that we are entitled to a portion of the oil spill restoration funds due to our subsistence resources being severely impacted, our commercial fishing jobs (that we depend on heavily for our annual incomes) being questionable indefinitely, and our shellfish beds being drastically affected.


I am an employee of the Tatitlek Mariculture Project and would like funding for this project to be continued. Our goal for this project is to make it self-sustaining so that it may provide long term employment opportunities in our village, and to provide an alternate subsistence resource for the resources that have been damaged by the oil spill. Funding of the Chugach Region Mariculture Project (93019) and the Bivalve Shellfish Hatchery & Research Center (93020) is: essential for us to reach this goal.

Please support the funding of the Chugach Region Mariculture Project and the Bivalve Shellfish Hatchery & Research Center Project, they mean very much to our village.

We also support the Subsistence Restoration Project (93017), the Habitat Use, Behavior, & Monitoring of Harbor Seals in PWS (93046) and the Chenega Chinook and Coho Salmon Release Program (93016).

Thank you very much.

Sincerely,


Steve S. Totemoff, Jr.
P.O. Box 112
Tatitlek, AK. 99677

733.5115

November 9, 1992

Exxon Valdez Oil Spill Settlement Trustee Council
645 C Street
Anchorage, AK. 99501

Dear Sirs:

I am a resident of the Village of Tatitlek, which is located in Prince William Sound, just four miles from Bligh Reef, where the Exxon Valdez ran aground. Our village has been impacted heavily by the oil spill both economically and culturally, and we feel that we deserve a portion of the oil spill restoration funds because our subsistence resources have been severely damaged, our commercial fishing jobs that we depend on so heavily for our annual incomes are questionable and our shellfish beds have been drastically affected.

Recently, our village began an oyster farming operation, with funding provided by the Tatitlek Mariculture Project. Our goal for this project is to make it self-sustaining, so that it may provide long term employment opportunities for our residents and to provide an alternate subsistence resource for the many resources that have been damaged by the oil spill. The Chugach Region Mariculture Project (93019) and the Bivalve Shellfish Hatchery & Research Center (93020) are essential in order for us to reach our goal of having a self-supportive project that will serve our community for generations to come.

We are also supportive of the following projects: Subsistence Restoration Project (93017), Habitat Use, Behavior, & Monitoring of Harbor Seals in Prince William Sound (93046) and the Chenega Chinook & Coho Salmon Release Program (93016)

We urge the support of the above listed projects, they mean so much to our community, both culturally and economically.

Thank you very much.

Sincerely,

Illene Totenoff
Mrs. Illene Totenoff
P.O. Box 109
Tatitlek, AK. 99677

Post-It™ brand fax transmittal memo 7671		# of pages ▶ 6
To <i>Evelyn Tuliussen</i>	From <i>Sandra Selanoff</i>	
Co. <i>T.A.P.R.</i>	Co. <i>Tatitlek, AK</i>	
Dept.	Phone # <i>325-2311</i>	
Fax #	Fax # <i>325-2298</i>	

November 9, 1992

Exxon Valdez Oil Spill Settlement Trustee Council
6455G Street
Anchorage, AK. 99501

Dear Sirs:

I live and work in the Village of Tatitlek in Prince William Sound, just four miles from Bligh Reef, where the Exxon Valdez ran aground. Our village has been impacted by the oil spill both economically and culturally. We feel very strongly that we are entitled to a portion of the oil spill restoration funds due to our subsistence resources being severely impacted, our commercial fishing jobs (that we depend on heavily for our annual incomes) being questionable indefinitely, and our shellfish beds being drastically affected.

I am an employee of the Tatitlek Mariculture Project and would like funding for this project to be continued. Our goal for this project is to make it self-sustaining so that it may provide long term employment opportunities in our village, and to provide an alternate subsistence resource for the resources that have been damaged by the oil spill. Funding of the Chugach Region Mariculture Project (93019) and the Bivalve Shellfish Hatchery & Research Center (93020) is essential for us to reach this goal.

Please support the funding of the Chugach Region Mariculture Project and the Bivalve Shellfish Hatchery & Research Center Project, they mean very much to our village.

We also support the Subsistence Restoration Project (93017), the Habitat Use, Behavior, & Monitoring of Harbor Seals in PWS (93046) and the Chitena Chinook and Coho Salmon Release Program (93016).

Thank you very much.

Sincerely,

Carolyn M. Komakoff
Carolyn M. Komakoff
P.O. Box 170
Tatitlek, AK. 99677

OPTIONAL FORM 99 (7-90)

FAX TRANSMITTAL

of pages 2

To *Dave Gibbons* From *Paul Gates*
 Dept./Agency Phone #

93325147

TAKE
PRIDE IN
AMERICA

United States Department of the Interior

OFFICE OF THE SECRETARY

1689 C Street, Suite 100
 Anchorage, Alaska 99501-5151

November 20, 1992

Michael A. Barton
 Regional Forester for Alaska Region
 Exxon Valdez Oil Spill
 Trustee Council
 645 G Street
 Anchorage, Alaska 99501

Dear Mr. Barton:

We have reviewed the 1993 Draft Work Plan and the associated Federal Register notice dated October 20, 1992, and offer the following comments for your consideration.

We believe the final 1993 Work Plan should clearly state that, prior to Trustee Council approval of 1993 projects, National Environmental Policy Act (NEPA) compliance must be completed. We also believe that the project descriptions in the 1993 Draft Work Plan should identify all applicable Federal, state, and local laws, treaties, executive orders, regulations, and consultation that must be completed prior to beginning work on approved projects. Examples of the required Federal consultation are found in the compliance requirements of the National Historic Preservation Act, Native Graves Protection and Reparation Act, Endangered and Threatened Species Act, Fish and Wildlife Coordination Act, Bald and Golden Eagle Protection Acts, migratory bird treaties, Alaska National Interest Lands Conservation Act, Clean Water Act, Safe Drinking Water Act, Coastal Zone Management Act.

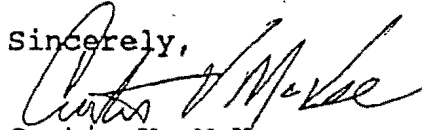
We also recommend that each project description in the final 1993 Work Plan clearly state why the project must be conducted in 1993 prior to the finalization of the Restoration Plan. We believe it was the intent of the EVOS settlement that EVOS funds spent prior to the finalization of the Restoration Plan, should be restricted to actions necessary to avoid irreversible loss of natural resources or to prevent or reduce continuing danger to natural resources and/or emergency restoration actions.

The 1993 Draft Work Plan states on page 13 that the detailed project budget is available for public viewing at the Oil Spill Public Information Center, Trustee Council teleconference sites, and selected libraries. In fact, the detailed project budgets were not sent to those public viewing areas until November 19, 1992. Since the deadline for public comments is November 20, 1992, the public clearly has not had the opportunity for meaningful review of both documents or time to prepare comments to the Trustee Council.

As stated in my November 17, 1992, memorandum to the Trustee Council, I believe the public comment period on the 1993 Draft Work Plan and detailed budget must be extended from November 20, 1992 for a reasonable period of time after the detailed budget is available to the public.

Thank you for the opportunity to comment on the Exxon Valdez Oil Spill Restoration 1993 Draft Work Plan.

Sincerely,

A handwritten signature in dark ink, appearing to read "Curtis V. McVee", written over the typed name.

Curtis V. McVee
Special Assistant to the Secretary
for Alaska



Alaskan Wilderness Sailing Safaris

The Quiet of Wilderness Deserves the Silence of Sail

Since 1974

November 20, 1992

Exxon Valdez Oil Spill Trustee Council
645 B Street
Anchorage, AK 99501

Dear Sirs:

Alaskan Wilderness Sailing Safaris supports the testimony submitted by the Alaska Wilderness Recreation and Tourism Association.

We wish to draw special attention to our support of the following projects:

- 1) All habitat identification and acquisition projects
- 2) All projects that will or may restore wildlife that do not include intrusive or lethal measures.
- 3) All projects that will or may restore beach communities without destroying existing ecosystems. We are opposed to the destruction of mussel beds.

We would like to see the following projects added:

- 1) Rewards for information leading to the arrest and conviction of persons harassing marine mammals or wildlife.
- 2) Survey of beaches important to tourism industry for remaining oil and development of a plan to remove it during the 1993 working season. Oil remaining on the beaches has an adverse effect on our charter guests and limits our ability to return to using the areas we visited prior to 1989. The loss of the scenic and wild-

AWSS, P.O. Box 1313, Valdez, AK 99686 (907) 835-5175

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life (intertidal zone, etc.) viewing services provided by the oiled beaches constitutes a continuing adverse effect on our ability to market, deliver a product, and make a living. We have tried advertising ecotourism learning experiences in the oil spill impacted area but have met with considerable consumer resistance. We have tried offering our guests a choice of visiting an area oiled by the spill; most guests consistently choose other locations.

Under U.S. law, the EVOS Restoration funds are the only way we have of recovering the services of natural resources damaged by the spill. There is no way for us to recover our economic losses. Thus, AWSS is disturbed that the criteria used in evaluating projects does not include a category for restoring the services provided by natural resources, such as scenic quality, that were lost.

We are also concerned that the Trustees have very little information on recreation and tourism use of the area and that the economic studies have not yet been released. We ask that the economic studies be released for public review. We propose that the FS as the major landowner consider submitting a request for funding of its own vessel to do surveys, research and monitor recreation and tourism activities in Prince William Sound.

Thank you for the opportunity to comment.

Sincerely,



R. James Lethcoe

93325149

Alaska Wilderness Recreation and Tourism Association

Board of Directors

Nancy Lethcoe
President
Alaskan Wilderness
Sailing Safaris

Carol Kasza
Vice President
Arctic Treks

Todd Miner
Secretary
Alaska Wilderness Studies
U of A Anchorage

Don Ford
Treasurer
National Outdoor
Leadership School

Bob Dittrick
Wilderness Birding

Eruk Williamson
Eruk's Wilderness
Float Trips

Tom Garrett
Alaska Discovery

Dennis Eagan
Recreation

Kirk Hoessle
Alaska Wildlands
Adventures

Bob Jacobs
St. Elias Alpine Guides

Karla Hart
Alaska Rainforest Tours

Marcie Baker
Alaska Mountaineering &
Hiking

Gayle Ranney
Fishing & Flying

November 19, 1992

Exxon Valdez Oil Spill Trustee Council
645 G Street
Anchorage, ALASKA 99501

RE: Draft 1993 Work Plan Comments

Dear Sirs:

The Board of Directors for the Alaska Wilderness Recreation and Tourism Association has reviewed the *Exxon Valdez Restoration 1993 Draft Work Plan* and offers the following comments.

A. The Trustee Council should primarily limit 1993 restoration actions to those projects that are time critical, would otherwise be a lost opportunity, or which aid in the restoration of lost natural resources and the services provided by those resources.

Habitat restoration projects such as protection for harbor seal haulout areas, nesting areas, and timber buybacks for habitat and scenic viewshed are the types of projects most beneficial to recreational users and the tourism industry.

AWRTA members are concerned that the agencies who are also the Trustees appear to be using EVOS funds to funding projects which should be funded in the normal course of fulfilling their statutory mandate. The Board also questions whether agencies are the only or even the best groups to be undertaking some of the proposed projects and believe that many of the goals of a project might be better fulfilled through utilizing the resources of the University of Alaska and private contractors.

AWRTA would also like to see more projects solicited from non-agency organizations in the future and all projects listed with a brief description and reasons for the Restoration Team and Chief Scientist's recommendation or non-recommendation. We found the Chief Scientist's comments most useful, especially in cases where we felt he might be lacking in information regarding impacts from the tourism industry. This helped us to focus our comments. However, we are concerned that other projects which did not make it to the Plan stage may have been excluded because the reviewers lacked appropriate information.

AWRTA, P.O. Box 1353, Valdez, AK 99686

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B. Are there other projects that should be included? Yes.

1) Develop a rewards program for information leading to the conviction of a person harassing marine mammals or wildlife in the spill impacted area. This would be similar to, but more extensive than, the Sea Lion Reward program recently initiated by the Cordova District Fishermen United. Reducing harassment would help injured species to recover. This would help the recreation and tourism industry recover the use of services provided by natural resources injured by the spill.

2) Develop a comprehensive long-term ecosystem monitoring program to quantify naturally induced changes and to help document the recovery/lack of recovery of species and ecosystem. Baseline information derived from a few years of study does not adequately capture long-term natural fluctuations in the ecosystem. There is currently inadequate information to determine when a species or ecosystem has been restored. Without a plan it is difficult to tell how a particular project fits into the recovery of the entire ecosystem. Scientific reports resulting from a long-term study could be made available to the public and would be very valuable to the recreation and tourism industry in preparing guides, naturalists, and tour boat operators with information to share with their clients.

3) Considerable amounts of tar balls and other spill products remain on beaches used by the recreation and tourism industry in Prince William Sound. A program should be developed to work with recreation and tourism operators to inventory affected beaches and develop a plan to remove the remaining oil. This oil reduces the services provided by the beaches (such as intertidal zone study/observation, scenic quality), has an adverse economic impact on recreational use and tourism, and is an on-going problem that needs to be addressed before another summer tourism season passes.

4) Garbage still remains from the oil spill cleanup on some beaches (raingear, sorbant pads, pompoms, etc.). This has posed a scenic pollution problem and had an adverse impact on local habitat for microtines, etc. We support a program to clean up this oil spill debris and to fund annual cleanups of PWS beaches.

C. Appropriateness of projects, scope, level of funding, and priority.

Priorities/Justification:

Should definitely be funded = 1

Support funding = 2

Opposed to funding = 3

Priorities/Justification was determined by project meeting one or more of the following justifications.

Priority 1 a) EVOS damaged resource or services provided by it important to recreation and tourism.

b) Project likely to aid the recovery of resources and the services they provide to recreation and tourism.

c) Project essential to an overall restoration framework.

d) Project important for understanding ecosystem, range of long-term natural variations, and evaluating recovery/restoration from EVOS.

Priority 2 a) EVOS damaged resource or services provided by it only marginally important to recreation and tourism.

b) Project of possible use to recovery of resources and the services they provide to recreation and tourism.

c) Project possibly important to an overall restoration framework.

d) Project possibly important for understanding ecosystem, range of long-term natural variations, and evaluating recovery/restoration from EVOS.

Opposed 3 a) Project would or could damage resources or the services provided by those resources that are important to recreation and tourism industry.

b) Not clearly related to the recovery of resources or their services.

Funding recommendations:

N = Project should not be funded.

F = Funding from Restoration funds.

A = Funding from regular agency budgets.

B = Should go out to bid.

Project	Priority	Funding	Comments
93002	1	F-B	Good for sports fishermen; cost might be reduced by open bid
93003	1	F-B	As above
93004	1	F-B	As above
93005	1	F-B	Important for cultural ecotourism; help avoid negative impacts on archeological sites
93006	2	F-B	Could be important for cultural ecotourism
93007	2	F-B	As above
93008	2	F-B	As above
93009	3	N	Not clearly related to restoring either a damaged resource or the services provided by that resource; AWRTA supports funding of a brochure that would describe briefly the injured resources and the way recreational users, tourists, and tour operators could avoid negative impacts on these resources, such as the dates bald eagles or harbor seals are sensitive to disturbance in their nesting/birthing areas. The brochure could inform the public of the rewards for information leading to the arrest and conviction of people harassing marine mammals and wildlife in the spill impacted area (Priority #1, funding level up to \$30,000).
93010	1	F-B	Restoration of murre and services provided important to all segments of the recreation and tourism industry.
93011	1	F-B	Significant reductions in the river otter population has occurred in Prince William Sound adversely affecting ability of wilderness guides to show clients river otters.
93012	1	F-B	Good for sports fishermen; cost might be reduced by open bid;
93014	2	A	Only loosely related to EVOS
93015	1	A	Should be funded by ADF&G not out of Restoration funds.
93016			No comment
93017			No comment
93018	3		Not an important sportfishery prior to spill; if ADF&G wants to

AWRTA, P.O. Box 1353, Valdez, AK 99686

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develop this fishery, should do so out of agency funds.

- | | | | |
|-------|-----|-------|--|
| 93019 | 3 | N | AWRTA supports villages desire to diversify their economies. However, EVOS funds should not be used for this purpose. |
| 93020 | 3 | N | Not clear how this helps wild mussels to recover. |
| 93022 | 1 | F-B | Restoration of mures and services provided important to all segments of the recreation and tourism industry. |
| 93024 | 3 | A | This is an important sportfishery, but its decline does not appear to be directly related to EVOS. AWRTA supports ADF&G/USFS funding this out of non-EVOS monies. |
| 93025 | 3 | A | This is an important sportfishery, but its decline does not appear to be directly related to EVOS. AWRTA supports ADF&G/USFS funding this out of non-EVOS monies. |
| 93026 | 3 | N | Not in spill area; could adversely affect wild stocks and have a negative impact on sportfishing. |
| 93028 | 3 | N | Watching the progression of naturally induced changes is a major component of ecotourism. Project would have an adverse impact on ecotourism opportunities. |
| 93029 | 3 | N | EVOS funds should not be used to fund pre-commercial thinning. Old growth habitat important to EVOS damaged resources can better be restored through timber purchase. |
| 93030 | 3 | N | Problems with water quality, disease and variety of salmon stocks at hatchery could adversely affect wild stocks in Red Lake. |
| 93031 | 3 | N | Uncertain about possible adverse effects of introducing hatchery stock into wild stock areas. |
| 93032 | 2 | A | Not clearly related to EVOS. |
| 93033 | 3/1 | N/F-B | Important species for bird watching. AWRTA opposes the killing of species for restoration purposes. Support funding for parts of project that are non-intrusive and non-lethal. Colorful Harlequin Ducks are an important species for bird watching and photography. |
| 93034 | 1 | F-B | Important species for bird watching. AWRTA disagrees with Dr. Spies comments: their habitats are threatened by developments within the tourism industry, such as inadvertant disturbance of nesting areas by kayakers, campers, etc. and resulting predation. Identification of habitat and protection of that habitat would help to minimize adverse impacts from recreational users and tourism industry. |
| 93035 | 3 | N | Important species for bird watching. AWRTA opposes the killing of species for restoration purposes. Support funding for parts of project that are non-intrusive and non-lethal. Black oystercatcher habitats are threatened by developments within the tourism industry, such as inadvertant disturbance of nesting areas by kayakers, campers, etc. and resulting predation. Identification of habitat and protection of that habitat would help to minimize adverse impacts from recreational users and tourism industry. AWRTA would support this type of research and restoration. |
| 93036 | 3 | N | Mussel beds are important ecological units in themselves. These beds were left as seed beds to restore mussels removed in the cleanup. The absence of mussels on cliffs and rocks remains a lost resource & service which adversely impacts the marketing, product delivery, and economic condition of tour operators. |
| 93038 | 1 | F | Important project for recreational users and tourism industry. |
| 93039 | 1 | F-B | Important project for recreational users and tourism industry. |

AWRTA, P.O. Box 1353, Valdez, AK 99686

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Should be put out to bid or directed to the University of Alaska.

93041 1 F

93042 1 F-B Very high priority project for recreation and tourism industry. Also should be a project to monitor the effects of the spill on transient pods. Project should go out to Bid or be directly channeled to North Gulf Coast Oceanic Society which began the research prior to the spill and has continued it under a contract to NOAA-MMS. Costs to NOAA-MMS for administration could be saved.

93043 1 F-B Very high priority project for recreation and tourism industry. Also should be a project to monitor the effects of the spill on transient pods. Project should go out to Bid or be directly channeled to Chuck Monet (and group) which began the research prior to the spill and has continued it under a contract to DOI-FWS contract. Costs to DOI-FWS for administration could be saved.

93046 1 F Harbor seals are an important megaspecies for all sectors of the tourism industry. Habitat use studies will help ecotourism industry and recreational users to avoid critical habitat areas thus avoiding possible adverse affects on harbor seals and aiding in their recovery. The tourism industry relies heavily on the watchable wildlife services provided by harbor seals and most members of the tourism industry do not voluntarily engage in actions that might be harmful to harbor seals. However, out of ignorance harbor seals can be inadvertently disturbed during pupping and molting seasons. This research should help to prevent this if the results are made available to the public. We would like to see a component added to the project that includes working with the tourism industry to identify possible areas of conflict and to help tour operators to mitigate this. Should be continued by agencies.

93047 1 F

93050 1 F

93051 2 F Important to sportsfishermen

93053 1 F

93057 1 F

93059 1 F

93060 1 F

93061 1 F

93062 1 F

93063 1 F Important to sportsfishermen

93064 1 F This is probably the one project that would do the most to help recreational users and tourism businesses to recover the services, such as lost scenic quality and wildlife viewing opportunities. AWRTA questions whether sufficient funds have been allocated to purchase the timber rights to an entire watershed. Purchasing timber rights to extend riparian buffer strips would be beneficial to sportsfishermen, but would have no value for restoring scenic quality and very limited, if any, value for restoring wildlife watching opportunities.

93AD 1 F

93RT 1 F

93AD 1 F

93FC 1 F

93 RT 1 F

AWRTA, P.O. Box 1353, Valdez, AK 99686

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As the Trustee Council knows, the courts have ruled that the recreation and tourism industry cannot sue oil companies for economic losses resulting from an oil spill. They cannot sue for the loss of the services provided by natural resources damaged by the spill, because the restoration funds are compensation for these services. There is no direct route for recreation and tourism operators who were directly affected by the spill to recover their economic losses. So far, very little attention has been paid to restoring the services provided by natural resources to the recreation and tourism industry. AWRTA requests the Trustees to address this problem.

Respectfully submitted,

Nancy R. Lethcoe



93325150

"The mission of the Council is to ensure the safe operation of the oil terminals, tankers, and facilities in Cook Inlet so that environmental impacts associated with the oil industry are minimized."

November 20, 1992

Exxon Valdez Trustee Council
645 "G" Street
Anchorage, Alaska 99501

Re: Exxon Valdez Draft 1993 Work Plan

The Cook Inlet Regional Citizens' Advisory Council is pleased to provide comment on the Exxon Valdez Draft 1993 Work Plan. Over the past six months Council staff has closely followed the development of this Plan.

Cook Inlet RCAC was formed under Section 5002 of the *Oil Pollution Act of 1990* (OPA90). The Council's mission is to ensure the safe operation of the oil terminals, tankers, and facilities in Cook Inlet so that environmental impacts associated with the oil industry are minimized. The organization's membership consists of representatives of communities throughout the Cook Inlet region, and specific interest groups as mandated by OPA'90.

At Cook Inlet RCAC's November 7, 1992 meeting, the Council recommended the Trustee's first priority should be to fund pollution monitoring programs for the entire Exxon Valdez spill-affected area, including Cook Inlet. The "Comprehensive Restoration Monitoring Program" (project number 93041) described in the Draft Work Plan addresses only areas in Prince William Sound and the Gulf of Alaska. Resources and services in Cook Inlet have been, and will continue to be, impacted by the Exxon Valdez Oil Spill.

Furthermore, it is the sentiment of Cook Inlet RCAC that:

- a monitoring program is time critical and should begin as soon as possible so a baseline of hydrocarbon contamination can be established for comparison in future years;
- implementation of environmental monitoring in Cook Inlet could aid in allaying public concerns regarding suspected chronic impacts of the Exxon Valdez Oil Spill;
- environmental monitoring, conducted through Cook Inlet RCAC, could begin in 1993; and

NOV 20 02 PM 13:05 URGENT FAX NO. 9072836102 P. 03
EXXON VALDEZ TRUSTEE COUNCIL
Draft 1993 Work Plan
November 20, 1992
Page Two

•monitoring, conducted through Cook Inlet RCAC, would be free from the delay and other confines of those conducted through government agencies.

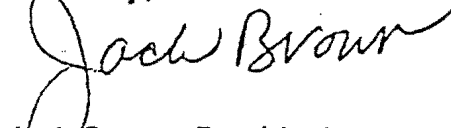
The Environmental Monitoring Committee of Cook Inlet RCAC has spent in excess of \$50,000 to develop such a program and previously requested the Trustee Council assist in implementation of the program.

In addition, it is Cook Inlet RCAC's stated position, the Trustee Council should prioritize expenditures toward spill prevention measures that are not being addressed in Cook Inlet and elsewhere in Alaska but are already in place in Prince William Sound. Items that are worthy of support include pre-positioning of response equipment, vessel escort in Cook Inlet, and research toward the effects of various spill response technologies.

We are sympathetic to the difficult task the Trustee Council has in balancing the many competing interests in allocating the settlement monies. As it stands, however, Cook Inlet RCAC is not in concurrence with the priorities established in the 1993 Draft Work Plan, nor its emphasis on studies to be conducted by its member agencies.

Once again, thank you for the opportunity to comment on the 1993 Draft Work Plan. Cook Inlet RCAC is available to assist the Trustee Council in any way possible in helping attain its established goals and objectives. If you have any questions, please feel free to contact either Lisa Parker, Executive Director, or Jim Dey, Program Coordinator for Environmental Monitoring at 283-7222.

Sincerely,


Jack Brown, President
Cook Inlet RCAC

cc: Cook Inlet RCAC Board of Directors
Charter Funding Companies
Environmental Monitoring Committee
Senator Frank Murkowski, U. S. Senate
Congressman Don Young, U. S. House of Representatives
Congressman George Miller, U. S. House of Representatives

PACIFIC RIM VILLAGES COALITION
c/o Chaaniqmiut Services Ltd.
P.O. Box 8060
Chenega Bay, Alaska 99574

November 20, 1992

Curtis McVee, Special Agent
U.S. Department of Interior
Fish & Wildlife Service
1011 East Tudor Road
Anchorage, AK 99503

Dear Mr. McVee:

We are pleased to present for your consideration the Pacific Rim villages Coalition's project proposal for inclusion within the 1993 Restoration Work Plan. The Pacific Rim Villages Coalition proposes to contract for restoration services. We request your endorsement of the project.

The Pacific Rim Villages Coalition is composed of Tatitlek, Chenega, Port Graham and English Bay Village Corporations in association with their Native Villages. We invite questions, and our General Manager, Charles W. Totemoff is available to respond to questions or comments. For any questions or comments, please contact Mr. Totemoff at Chenega Bay. Mr. Totemoff's telephone is 573-5118.

Very truly yours,

PACIFIC RIM VILLAGES COALITION

By: Patrick Norman
Patrick Norman,
President of Port Graham Corporation
for Pacific Rim Villages Coalition
and Charles W. Totemoff, General Manager

PACIFIC RIM VILLAGES COALITION

Project Proposal

for

Services

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EXXON VALDEZ OIL SPILL PROJECT PROPOSAL DESCRIPTION

PROJECT TITLE: Coordinated Contract for 1993 Restoration work projects with the Pacific Rim Villages Coalition.

PROJECT CATEGORY: Restoration Management Actions

PROJECT TYPE:

LEAD AGENCY:

COOPERATING AGENCIES: All

PROJECT TERM: January 1, 1993 through December 31, 2001 (balance of restoration effort)

INTRODUCTION:

A. Background on the Resources/Services.

The Pacific Rim Villages Coalition Joint Venture is composed of Tatitlek Corporation¹, Chenega Corporation², Port Graham Corporation³, and English Bay Corporation⁴ (collectively, "Village Corporations"). Each venturer and its land is located in the oil impacted area. The Village Corporations are forming a joint venture in order to undertake direct contracting with the Trustees Council and Lead Agencies in order to carry out the terms and conditions of specified restoration projects as identified within the 1993 Draft Work Plan. See also Table 1, hereto. Before identifying specific work projects, the Joint Venture will first discuss the legal basis for its proposal.

¹ Tatitlek Corporation has received authority from the Native Village of Tatitlek to contract for services pursuant to P.L. 93-638, 25 U.S.C. §450 a et. seq.

² Chenega Corporation has received a resolution endorsing its efforts from the Chenega Bay IRA Council, also pursuant to 25 U.S.C. §450 a, et. seq.

³ Port Graham Corporation has received a resolution endorsing its efforts from the Port Graham IRA Council, also pursuant to 25 U.S.C. §450 a.

⁴ The Native Village of Nanwalek has given English Bay Corporation its authority, pursuant to 25 U.S.C. §450 a, and English Bay Corporation has acted and continues to act as the agent for the Native Village of Nanwalek.

1. CONSULTATION AND CONSENT.

Chenega Corporation, Port Graham Corporation and English Bay Corporation were the named class representatives in a class action brought in the United States District Court for the District of Alaska, and entitled The Native Village of Chenega Bay, et al. vs. The United States of America and the State of Alaska, (hereinafter "Native Interests Litigation"). The Native Villages of Chenega Bay, Tatitlek, Port Graham and Nanwalek (f/k/a English Bay) were the named Native Village Representatives. The Native Interests Litigation was brought in order to resolve disputes concerning Natural Resource Damages⁵, and to seek resolution of two cases pending in the United States District Court for the District of Columbia.

Following the execution of a Settlement Agreement and Consent Decree in the Native Interests Litigation, the United States and the State of Alaska entered into a Settlement Agreement with Exxon Shipping Company and Exxon Corporation, resolving certain civil and criminal actions. See United States of America v. Exxon Corporation, Exxon Shipping Company, and Exxon Pipeline Company, in personam, and the TV Exxon Valdez in re Civil Action No. A91-082 (D. Alaska)., and State of Alaska vs. Exxon Corporation and Exxon Shipping Company, Civil Action No. A91-083 Agreement and Consent Decree (Governing Agreement). Thereafter, Exxon entered pleas pursuant to a plea agreement in United States vs. Exxon Shipping Company, Case No. 90-015 Cr. (D. Alaska). The Governments also sought dismissal of claims asserted by Exxon against the Governments in Exxon Shipping Company, et al., vs. Manuel Lujan, et al., Civil Action No. A91-219 Civ (D. Alaska) (Lujan).

In order to obtain the dismissal with prejudice of Lujan, the Governments relied upon the settlement of the Native Interests Litigation. The State of Alaska, in its memorandum in Support of the Motion for Final Approval of the Settlement between the Governments and the Native Interests, noted the importance of resolution of that litigation to settlement of the Lujan case. See State Memorandum at page 2.

The Village Corporations have demonstrated their willingness to assist the Governments in their efforts to compromise and settle Trustees related obligations under the Clean Water Act, CERCLA, and other environmental laws. In return for this assistance, the Governments promised to continue to work with the Village Corporations and Native Villages most directly impacted by the spill.

⁵ As that term is defined and used in the Settlement Agreement and Consent Decree entered in Case No. A91-454 Civ. (D. Alaska). Supra.

The Native Interests Settlement Agreement requires the Governments, pursuant to the Settlement Agreement, at paragraph 10 to obtain the consent of an ANCSA Corporation prior to undertaking certain activities:

Any damage assessment or restoration activities performed on lands legally owned by members of the ANCSA Corporation class shall be conducted only with the prior consent of the respective owners of those lands.
(Emphasis supplied)

See also paragraph 11:

Subject to the provisions of paragraph 10 above, each member of the ANCSA corporation class agrees to provide the Governments access to land legally owned by it, for the purpose of conducting damage assessment or restoration activities, if such activities are determined by the Governments to be necessary or appropriate.
(Emphasis supplied)

And see paragraph 12:

The Governments shall, to the extent required by Federal and State law, obtain and consider the views of the ANCSA corporation class prior to making decisions relating to natural resource damage assessment or restoration activities performed on lands selected but not yet conveyed to members of the ANCSA corporation class, and lands described in paragraph 8(b) herein.

According to the United States (joined into by the State):

[P]aragraphs 10 and 12 of the (Native Interests Litigation) Settlement Agreement require the Governments to obtain approval from the corporation class members prior to the commencement of damage assessment or restoration activities performed on lands legally owned by such members, and to obtain and consider views of the corporation class members prior to commencing such activities on selected but not yet conveyed lands.
(Emphasis supplied)

See United States' concurrence with Plaintiff's Motion for Final Approval of Settlement at pg. 8 (submitted January 14, 1992 in Case No. A91-454 Civ, supra.) See also State's memorandum, supra, at pg. 2 ("the State joins in the concurrence with Plaintiff's Motion for Final Approval filed by the United States in this Action").

The Pacific Rim Villages Coalition is an attempt to implement the terms and conditions of the Settlement Agreement and Consent Decree

more fully and to allow for continued consultation, as required pursuant to paragraphs 10 and 12 thereof. In this regard, numerous work projects within the 1993 work program include restoration activities on or adjacent to ANCSA Corporation titled lands, littoral interests, and selected land not yet conveyed.⁶

2. FEDERAL AND STATE LAW PROVIDES A FRAMEWORK FOR DIRECT CONTRACTING.

In addition to the Settlement Agreement's clear requirements for consent and approval as well as consultation between the Government and the Village Corporations, federal and state law also requires significant consultation.

(A.) Archaeology and Historical Preservation.

In matters pertaining to archaeology, the Exxon Valdez Oil Spill Trustees stated in Restoration Framework, Vol. 1:

Archaeological resources, including sites and artifacts, constitute an important part of our national and state heritage. They also have international importance in that they constitute a significant link in our knowledge and understanding of Native People who have inhabited arctic and sub-arctic regions for many thousands of years. The resources help us understand our ancestors' past, and enable greater appreciation for the richly varied cultures found in Alaska. The oil spill area contains both ancient and more recent archaeological resources.

See Vol. 1, April, 1992 Restoration Framework, Appendix A-40.⁷

⁶ See for example, Project Nos. 93005 through 93007 (Archeological) and compare with paragraph 8 of the Settlement Agreement and Consent Decree ("claim includes preservation, protection and restoration of archeological and cultural resources and archeological sites..."); public recreation projects (See for example, coordinated recreation restoration planning and assessment project, submitted by the Alaska Department of Natural Resources in cooperation with the Forest Service, et al., and Project No. 93009, Public Information, Education, and Interpretation). There are projects that are site specific, See for example Project No. 93011 (harvest guidelines for terrestrial animals); 93016 (Chenega Bay chinook and silver salmon); 93017 (subsistence food safety, involving Tatitlek, Chenega, English Bay, and Port Graham), 93018 (cutthroat trout, targeting Eshamy Lake, among other area); 93029 (PWS Second Growth Management), Oiled Mussel beds, Project Nos. 93035 and 933036; Shoreline assessments involving Native interest, 93038, 93041, and 93047; habitat protection (93046, 93047, 93051; the Chugach Region mariculture project and the bivalve shellfish hatchery and research center (93019 and 93020).

⁷ It has already been recognized that archeological resources were impacted by the oil spill. Federal law requires consultation with Native American land owners prior to undertaking activities which would have an impact on archeological and cultural sites. See Colorado River Indian tribe 605 F.Supp. 1425, 1432 - 33 (Cd. California, 1985). See also 36 C.F.R. §§800.3(a) and (b), 806.6. The joint venture submits that pursuant to the Archeological Resource Protection Act of 1979, 16 U.S.C. §470(a)(a) et. seq., their lands are specifically included within the definition of "Indian Tribes", requiring federal agencies to protect their cultural and religious sites, both on and off such lands. 16 U.S.C. 470(b)(b)(5). See also AS 41.35.080, which states in part:

However, nothing in AS 41.35.010 - 41.35.240 diminishes cultural rights and responsibilities

The United States, pursuant to 36 C.F.R. §296.1, has provided the Secretary of the Interior with federal land manager jurisdiction over Indian land, in order to "insure the confidentiality of information about archeological resources when disclosure would threaten the archeological resources." The federal land manager is required to consult with Alaska Native Village Corporations pursuant to 36 C.F.R. 296.4(f)(3) and (g). The United States Forest Service's regulations specifically require that both federal and state governments must be sensitive to the special concerns of Indian tribes (including ANCSA Village Corporations) with regard to historic preservation issues "which often extend beyond Indian land to other historic properties." 36 C.F.R. §801(d)(2)(iii).⁸

(B.) Wilderness Lands, Recreation and Tourism.

The Exxon Valdez Oil Spill Trustees also recognize the necessity of restoring wilderness land under federal and state management, including areas within Chugach National Forest and Kenai Fjords National Park and the Katachmak Bay State Wilderness Park. See Appendix A-40, April 1992 Restoration Frame Work. The Trustees recognize that wilderness lands, undesignated wild lands and developed lands provide "in part, the basis for Alaska's tourist economy." id. The Trustees also recognize that "many Americans benefit by knowing that in Alaska large areas of undeveloped lands provide habitat for natural, healthy populations of wildlife." id. Within the spill area, Native lands owned by members of the Joint Venture are adjacent to such federally and state managed lands, and have themselves been severely impacted by the oil spill.

Federal law supports the Joint Venture's contracting efforts on these conservation management units (CMU's). For example, The Indian Self Determination Act provides that, "the United States is committed to supporting and assisting Indian Tribes in the development of strong and stable tribal governments, capable of administering quality programs in developing the economies of their

of persons of aboriginal descent or infringes upon their right of possession and use of those resources which may be considered of historic, prehistoric, or archeological value.

Thus, pursuant to AS 41.35.080:

If the historic, prehistoric, or archeological resource involved is one which is, or is located on a site which is, sacred, holy, or of a religious significance to the cultural group, the consent of that cultural group must be maintained before a permit may be issued under this section.

⁸ Indeed, the United States Forest Service, in Solicitation No. R10-91-06, Contract No. 53-0109-1-00325, awarded a contract to the Research Foundation of the State University of New York at Binghamton for archaeological testing, shoreline segment survey, and historic property inspection in Prince William Sound, the Kenai Fjords, and the Lower Kenai Peninsula. That study is discussed, at some length, throughout the 1992 Proposed Work Projects. The Village Corporations were not consulted, and have not yet seen a copy of the study. Yet, the sites appear to be on ANCSA Corporation lands or adjacent to those lands.

respective communities." See 25 U.S.C. 450a(b). See also 25 U.S.C. 450b(e), defining an Indian Tribe as "any Alaska Native Village or regional or Village Corporation as defined in or established pursuant to the Alaska Native Claims Settlement Act...." The Self Determination Act provides an additional base for the Government to enter into contracts with this Joint Venture for restoration.

Pursuant to the Alaska National Interests Lands Conservation Act (ANILCA), both the Department of Interior and the Department of Agriculture are required to establish programs requiring local hire of persons who, by reason of having lived or worked in or near a National Forest, National Park, etc., have special knowledge concerning natural or cultural resources. See 16 U.S.C.A. 3198(a). Further Congress, in ANILCA, also declared that, as a matter of policy, federal land managing agencies are required to "cooperate with adjacent land owners and land managers, including Native Corporations...." 16 U.S.C. 3112(3). ANILCA requires federal conservation unit managers to give preference to Native Corporations which are directly affected by the establishment or expansion of such units. 16 U.S.C. 3197. ANILCA also requires the Department of the Interior to provide assistance, advice, technical expertise to a Native Corporation in order to protect and interpret for the public benefit cultural and archaeological resources. Such assistance is without regard to whether title to such resources is in the United States. 16 U.S.C. 3206.

(C.) Subsistence.

The Trustees have also recognized that subsistence opportunities for rural residents of Prince William Sound, the Kenai Peninsula and Lower Cook Inlet must be restored. See April, 1992, Restoration Frame Work, Appendix A-41, citing ANILCA Section 801(1): "The continuation of the opportunity for subsistence uses by rural residents of Alaska, including both Native and Non-Natives, on the public lands and by Alaska Natives on Native lands is essential to native physical, economic, traditional and cultural existence...." The Trustees have previously also recognized that such resources "provide products that serve important functions in daily life and play a significant role in cultural practices and traditions." id. The Joint Venture also seeks, pursuant to federal law under ANILCA and the Trustees' recognition, as cited, to undertake contracts for restoration of subsistence services.

Thus, it is the intent of the Joint Venture to specifically contract with federal and state agencies concerning projects impacting their property interests and which relate to archaeological matters, wilderness restoration, recreation and tourism, and restoration of natural resources, including subsistence natural resources.

B. Location.

The Joint Venture is formed to provide direct services for restoration projects within the Chugach region, and will be available to provide services in other oil spill impact areas, or in other locations where restoration projects are proposed. Within the Chugach region, the Joint Venture proposes to perform the work projects identified at Table 1 and further discussed in the "How" section of the Project Descriptions.

WHAT:

A. Goal.

1. The goal of this project is to contract for and to undertake restoration projects within the Chugach region or implicated in any restoration project approved by the Trustees commencing with the 1993 Work Plan, and continuing until completion of the restoration projects pursuant to the Memorandum of Agreement between the United States and the State of Alaska, to further the purposes of the restoration, to assist the agencies in complying with their obligations to the Native Interests, and to carry out all services so contracted efficiently, coordinating agency activities through local talent and community involvement.

B. Objective.

1. Assist the governments in their responsibilities pursuant to paragraphs 10 and 12 of the Settlement Agreement and Consent Decree in The Native Village of Chenega Bay, et al., vs. State of Alaska and the United States, ARPA, The Indian Self Determination Act and ANILCA by utilizing locally available human resources, facilities, equipment and services in conducting restoration projects with direct involvement between the joint venture and the agencies.

2. Reduce agency manpower requirements by providing services efficiently without the need for administrative-type costs associated with bringing in individuals from distance areas, including acquisition and transportation expenses.

3. To optimize the use of services in the field without redundancy of unnecessary impact due to duplicative logistics or personnel movements, and to provide opportunity for residents of the heavily oiled area to have a hand in the restoration of the environment and receive some economic benefit from the restoration effort.

4. Involve local residents in the oil spill restoration to further the psychological healing effect of restoring lands and public resources.

5. Fully implement federal and state laws and regulations pertaining to archeological, historical, and historical site protection, context and restoration.

6. Provide employment and contracting opportunities to the impacted communities.

7. Confine knowledge of and exposure to sensitive issues and materials to the owners thereof, and to protect their property interests.

8. Further the goal of the restoration process of public information, awareness, and local control.

9. Further the objectives stated in each project summary identified in the 1993 draft work plan and summary Table 1 hereto.

WHY:

A. Benefit to Injured Resources/Services.

Direct contracting with the Joint Venture fully implements the Settlement Agreement between the Native Interests and the Federal and State Governments and recognizes the need to increase the efficiency of services which are proposed to be delivered to the injured resources pursuant to the restoration projects. Direct contracting with the Joint Venture also allows restoration funds to be expended wisely and directly on restoration of resources without overburdening the agencies.

In addition, such contracts will allow restoration projects to begin in a timely manner, without complications, and by utilizing a structure involving local residents already tested by the environmental disaster and eager to continue to assist the Trustees.

B. Relationship to Restoration Goals.

The Joint Venture proposes to further each of the restoration projects pursuant to the goals set forth in each project summary. In addition, because the Joint Venture will be composed of residents of impacted areas, human resources will be fully utilized while avoiding negative impact to the community, which could result if fully competent residents were to be standing idly by as the agencies expend large amounts of money in those areas.

HOW:

A. Methodology.

We are proposing an organizational structure for the joint venture in Table 2 hereto. The organizational structure entails an individual associated with planning and quality control for many years, Tom Fink (resume attached), to assist the management structure of the joint venture in compiling more detailed work programs based upon projects actually approved by the Trustees in December.

Chenega Corporation's subsidiary, Chaaniqmiut, Inc., will serve as the managing venturer. Chenega Corporation has received widespread recognition of its response to the oil spill. See Attachments A-C. Each venturer will be secondarily responsible for project activities within its geographic area with regard to employment and services. John Johnson, of Chugach Alaska Corporation, will assist with the overall management of the archeology and cultural resources components of the projects. The implementation of the program involves the following steps:

1. The General Manager and Planning Control Consultant will jointly define project requirements with the lead agency.

2. Each of the joint venture partners has or will inventory and certify personnel, equipment and facilities. This data will be collected and coordinated with the approved project work plan and agency requirements so that each project contracted will be fully address in terms all resources required for it efficient execution.

3. In consultation with the Technical Coordinator, who at this time is proposed to be Dames & Moore, the General Manager, the Operations Manager and the Planning and Quality Control expert will proceed, in consultation with the lead agency, to implement and execute the work projects.

4. Personnel will be trained as per the requirements of each work project funded and contracted.

B. Coordination With Other Efforts.

As set forth, above, coordination is the key objective of the Joint Venture. Based upon the management frame-work now in place, direct contracts will be coordinated pursuant to agency and reporting requirements.

ENVIRONMENTAL COMPLIANCE:

Environmental compliance is addressed in each project summary.

JOINT VENTURE SCHEDULE:

Each project will be undertaken pursuant to the schedule set forth in the Draft Work Plan, or as any discreet project may be subsequently amended. Steps, descriptions and begin and finish stages will be applicable to Work Plan Projects during the course of each contract.

BUDGET:

We intend to contract pursuant to the work project budget of each contract, and pursuant PL 93-638 guidelines.

TABLE 1:Projects Intended to be Pursued By Pacific Rim Villages Coalition.

<u>Project No.</u>	<u>Project Title</u>
93005	Cultural Resource Information, Education and Interpretation
93006	Site Specific Archaeological Restoration
93007	Archaeological Site Stewardship Program
93008	Archaeological Site Patrol and Monitoring
93009	Public Information, Education and Interpretation
93011	Develop Harvest Guidelines to Aid Restoration of River Otters and Harlequin Ducks
93016	Chenega Bay Chinook and Silver Salmon
93017	Subsistence Food Safety Survey and Testing
93018	Enhanced Management for Cutthroat Trout/Dolly Varden in PWS
93025	Montague Chum Salmon Restoration
93029	PWS Second Growth Management
93033	Harlequin Duck Restoration

93035	Black Oyster Catchers/Oiled Mussel Beds
93036	Oiled Mussel Beds
93038	Shoreline Assessment
93041	Comprehensive Monitoring
93045	Marine Birds/Sea Otter Surveys
93046	Habitat Use, Behavior and Monitoring of Harbor Seals in PWS
93047	Subtidal Monitoring
93051	Habitat Protection: Stream Habitat Assessment
93061	New Data Acquisition
93064	Eminent Threat Habitat Protection
93019	Chugach Region Mariculture Project
93020	Bivalve Shellfish Hatchery and Research Center

Project No. Will Be Assigned

Project Title: Coordinated Recreation Restoration Planning and Assessment

EXXON VALDEZ OIL SPILL RESTORATION WORK PLAN:

A. Project Discussion.

Most of the proposed projects in the 1993 Draft Work Plan for the Exxon Valdez Oil Spill Restoration are appropriate in scope, however we are concerned about funding/execution mechanisms. It would seem that most of the projects use an unusually high proportion of governmental agency personnel when the local village corporations can execute much of the work on many of the projects. The advantages of local village corporation participation are:

- the local villagers would have the psychological healing effect of assessing damage and restoring their own territory;
- the local villagers would benefit from on-the-job technical training during execution of the projects;
- the local villagers are close to the potentially affected resources and have intimate knowledge of their territory;

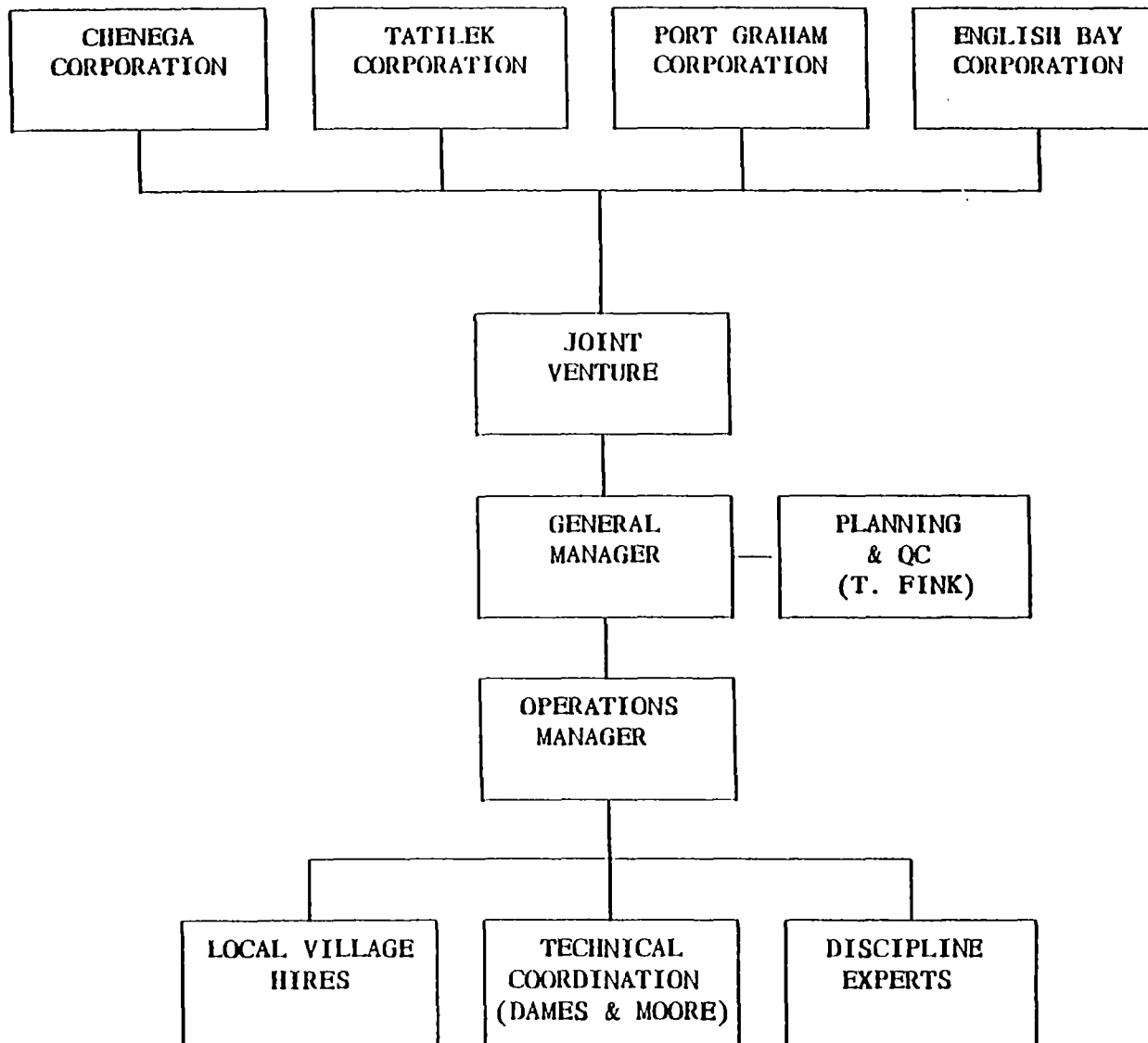
- the local village corporations have a management track record on previous PWS restoration projects;
- the projects are already conceptually designed by the agencies and can be executed using a minimum of technical consultants;
- the projects would inject additional employment and revenue opportunities into the area most affected by the oil spill;
- PL 93-638 provides a mechanism for village corporations to contract with the agencies that designed the studies, and the agencies are well qualified to serve as contract managers.

The village corporations of Chenega, Tatitlek, English Bay, and Port Graham have formed a joint venture to bid on these projects. The Joint Venture assumes that individual agencies will act as contract managers and that the Trustees will authorize and encourage such an approach.

If the Trustees agree to this approach, we would enter into negotiations with individual agencies to execute their particular projects with a joint venture organization structured approximately as follows:

ORGANIZATIONAL CHART FOLLOWS:

ORGANIZATIONAL STRUCTURE



The village corporations have reviewed all the proposed project listed in the 1993 Draft Work Plan. They have determined that many of the projects would require intimate knowledge of PWS and of its resources, and that most projects would require field assistance. From this list of projects, the corporations feel that their participation in the restoration process could best be implemented by conducting projects and/or participating, in a meaningful way, toward the success of other projects.

We feel that village involvement would add credibility as well as a sense of local participation and a feeling of control of one's own destiny. As such we feel that the villagers should be included in projects where they could make a logistic and field contribution.

Below are listed projects that the Pacific Rim Village Coalition has decided would be important for its major participation.

Specific identifications.

1. Subsistence Restoration Project - Project No. 93017

This is a two year study to restore subsistence use of fish and wildlife damage by the Exxon Valdez, and includes community meetings to identify and map specific areas and resources of continued concern to subsistence users. Three of the joint venturers have already auto-cad mapped their lands and oiling. Thus, data already existing at the joint venture will further a focused approach. In addition, the project includes, at least in part, Chenega's proposal for funds to be made available to support subsistence food sharing program between communities. Further, samples will be collected, and there will need to be imputing with regard to the planned 1993 spring shoreline survey.

The "How" section of 90317 is especially important to the Joint Venture. Discussion includes "involving subsistence users and decisions affecting mitigation" and also the subsistence study. These are the village corporations responsible for that subsistence study. The Joint Venture has in the past retained high caliber experts, and is presently consulting with Dave Schmidt of Dames & Moore. Village Corporation shareholders and village residents are the population group the project will most impact. The Joint Venture respectfully suggests that, if the concern is focussed at the Joint Venturers communities and residents, it should clearly undertake this project.

2. Shoreline Assessment - Project No. 93038: Restoration Monitor

This project is for a term beginning January 1 and ending September 30, 1993. It is divided into two phases; phase one is a physical survey of selected shoreline and phase two is restoration of land

and resource uses by light duty pickup during and after survey. In addition "larger scale treatment work, if necessary, would be identified on work orders and restoration crews from Chenega, Port Graham or other areas would be hired to perform the identified work." (Emphasis supplied.)

The areas include Knight, LaTouche, Evans, Elrington, Green and Disk islands in Prince William Sound and Tonsina Bay, Windy Bay and Chugach Bay in the Gulf of Alaska. We believe additional assessment is needed in the Kenai Fjords, as well as Chenega, Bainbridge and Fleming Islands in Prince William Sound.

Chenega Corporation successfully bid upon Exxon clean-up contracts in 1991 and 1992. In addition, Chenega performed well on local response projects in 1990 and 1991. The Joint Venture lands are directly implicated. Tatitlek also had successful local response projects. Further, additional determination is planned for clean-up of oiled mussel beds and the 1993 spring survey of mussel beds (93036, see infra).

This project would be augmented by the addition of villagers who would provide local area knowledge and contribute to tasks such as dispatch work and surveying, as well as clean up and treatment efforts. The crews would be HAZWOPER trained and equipped. Wastes generated would be treated through approved facilities. Environmental permits and notifications would be obtained prior to commencement of field work.

3. Comprehensive Monitoring Program Phase II: Monitoring Plan Development - No. 93041

Our joint venture is very interested in participating in the field work arising from the detailed monitoring plan devised by the consultant/workshop described in the project summary. We can participate in the workshop and contribute significant information on the logistics and details of operating both ashore and afloat in PWS for the multi-year project of Phase 3. We are also interested in a sub-contract with your planning consultant so that he can access our expertise on marine and terrestrial operations and logistic capabilities. We are very interested in contracting to provide logistical and operational support in Phase 3 as well as in providing guidance to monitoring personnel on access/operations on our lands and on the waters surrounding village land.

4. Subtidal Monitoring: Recovery of Sediments, Hydrocarbon-degrading Microorganisms, Eelgrass Communities, and Fish in the Shallow Subtidal Environment - Project No. 93047

Again, this is an opportunity to use our logistical and operational expertise ashore and afloat. Presently the budget for this project seems organized under three agencies as three self-contained sub-

projects. We suggest that combining logistic and vessel support under the joint venture would provide an economical and simplified approach.

5. Chenega Chinook and Coho Salmon Release Program - Project No. 93016

This project is designed to release salmon in the vicinity of Chenega Village. This would present an excellent opportunity for long-term village participation.

With ADF&G technical assistance, we could contract to implement the field work in transporting, holding, and releasing salmon smolt to produce a new subsistence stock.

6. Recovery Monitoring and Restoration of Intertidal Oiled Mussel Beds-Project No. 93036

This project involves the sampling of mussels and sediments for petroleum hydro carbon following a protocol established by NOAA and the NRDA process. In addition, there will be efforts to identify new areas of continued contamination. Presently, the National Parks Service is surveying and sampling mussels and sediments along the Kenai Peninsula.

This project requires the collection of mussels from areas affected by the oil spill. Many of these areas are in close proximity to the village or are familiar to local resource users. We are prepared to contract to collect mussels and sediment samples as well as provide ashore and afloat logistical support. The project should be expanded to include testing in Windy Bay and Chugach Bay.

7. Site-Specific Archaeological Restoration - Project No. 93006

Consultation is required under this study, in order to conform with Part 106 of the Archaeological Resources Protection Act. The first part of the project appears to be a full damage examination and analysis of the injured sites followed by recovery analysis and curation and data recovery. NPS has already committed a majority of its funds to conduct a sample survey and evaluation of coastal sites in the Kenai Fjords. These are most assuredly lands selected by Port Graham and English Bay under OPA 90. In addition, the U.S. Forest Service is working in the Prince William Sound area. The joint venture considers this project of the utmost importance and appropriate to contract.

8. Archaeological Site Stewardship Program - Project No. 93007

The Stewardship Program is based on cooperation between SHPO and federal agencies and private land owners "interested in participating in the Stewardship Program...." The program is

supported with the site monitoring proposal. See infra, Project No. 93008.

The program is only worthwhile to the extent village residents are directly involved in it, and requires joint venture involvement to be successful. We would not support the project unless the Joint Venture received a contract for our areas.

9. Archaeological Site Patrol and Monitoring - Project No. 93008

The idea of this project is laudable, but the proposed execution is insensitive. Agencies can not create a greater public awareness of the value of archaeological resources and laws protecting them, without themselves being sensitive to the strong feelings and beliefs of the indigenous owners. An agency presence does not demonstrate agency interest in archaeological resources nor discourage and prevent future vandalism. The village joint venture should assist in identifying areas most vulnerable to looting and vandalism, tracking the geographical and temporal variation in the incidence of looting or vandalism and increasing the efficiency and effectiveness of protection by coordinating with "involved agencies." The three agencies and the state apparently have patrol capabilities in the oil spill area. However, no village corporation has been hired. This is an ideal program in which to involve the joint venture on a contractual basis, and also to develop a greater awareness of indigenous cultures within the cooperating agencies.

10. Public Information, Education and Interpretation - Project No. 93009

This project involves the public information outreach in order to inform and educate the public on the effects and impacts of the Exxon Valdez oil spill and to enhance eco-tourism.

The program is presently slated with an emphasis on the communities of "Valdez, Whittier, Cordova, Seward, Homer, Kodiak, and the Municipality of Anchorage." Public information should emphasize the heavily impacted Native communities and identify private ownership as well. The National Park Service (Port Graham and English Bay) and the Alaska Department of Fish & Game (Tatitlek and Chenega) would each benefit by creating opportunities for neighboring Native land owners. This project will more than likely involve use of privately owned Native lands, whether intentionally or not. It is thus crucial to involve the village corporations to publicize their ownership interests and advance tourism and recreational projects in cooperation with the agencies.

Additional Comments:

These projects include restoration and site monitoring. Many of these sites have cultural and historic values to the local villages and this create a band of personally motivated protectors. Because the villages have a high degree of interest in maintaining their cultural heritage, the joint venture would be interested in taking a leading role in several of these three projects. Archaeologists with local and State-wide expertise such as Dr. Laura Johnson and Mike Yarborough, Jack Lobdell and cultural heritage specialist John Johnson could be sub-contracted within the previously mentioned organizational structure. The villagers have local knowledge as well as a vested concern in the resource, and as such would add credibility and enthusiasm to the project. Additionally, we could provide logistic and field support as well as background information capabilities.

11. Enhanced Management of Wild Stock, PWS, Emphasis on Cutthroat Trout and Dolly Varden - Project No. 93018

This project, which involves monitoring of weirs, obtaining scales, and so on, directly impacts Chenega-sensitive areas including Eshamy Lake. The joint venture believes it should receive the contract.

12. Chugach Region Mariculture Project - Project No. 93019

The joint venturers have supported this project before the Trustees Council, and have received some indication that the State supports the project. The project was put forth by the Chugach Regional Resources Commission. It specifically identifies Chenega and Tatitlik as well as English Bay and Port Graham. This project will restore services and provides a replacement of certain subsistence resources in order to allow injured resources to regenerate and at the same introduce a new industry to serve the effected communities. The Joint Venture supports the project, and requests the opportunity to contract with ADF&G.

13. Bivalve Shellfish Hatchery and Research Center - Project No. 93020

See Comments to Project No. 93019 (Mariculture), supra.

14. Montague Island Chum Salmon Restoration-Project No. 93025

The project involves stream cleaning such as boulder and log placement, in three streams in the Port Chalmers area, riparian habitat rehabilitation of 25 acres at the same streams, riparian forest assessment at 5 stream sites, riparian forest management and fisheries and hydraulic assessments. The work is labor intensive. It is ideally a project for the joint venture.

15. Prince William Sound Second Growth Management - Project No. 93029

This project is intended to inventory data bases, habitat, and to improve habitat for "pink and chum salmon, harlequin duck, marbled murrelet, river otter and bald eagle. The project can not be preformed without consent. The agency should contract for the joint venture's involvement.

16. Harlequin Duck Restoration Monitoring Study in PWS, Kenai, and Afognak Oil Spill Areas - Project No. 93033

The project is fairly technical, but is intended to characterize nesting habitat, reproductive failure, and whether or not reproductive failure exist elsewhere than western PWS, i.e.: the Kenai coast and Afognak Island. It therefore is land specific and thus, an excellent contract opportunity for the joint venture.

17. Potential Impacts of Oiled Mussel Beds on Higher Organisms- Project No. 93035

This is another Fish & Wildlife Service sponsored study. It, however, ties into the oil musseled beds studies which the joint venture applies to perform. The technical aspects are capable of sub-contracting with agency coordination. This study, however, should be expanded to Lower Cook Inlet.

18. Surveys to Monitor Marine Bird and Sea Otter Populations in PWS-Project No. 93045

This is a boat survey program. The joint venture offers boat services and lodging services. The project is too geographically limited, however, it should be expanded to include Lower Cook Inlet.

19. Habitat Use, Behavior and Monitoring of Harbor Seals in PWS- Project No. 93046

This project proposes aerial surveys and visits to Chenega Bay and Tatitlek once a year to discuss "survey results with residents." It is recognized that seal is important for subsistence purposes, but visits appear to be on an unreasonably infrequent basis, and do not appear to provide sufficient information to the affected communities. Rather than once a year visits, the project should be contracted to the Joint Venture and significant information shared. The project should be expanded to include Lower Cook Inlet and the Villages of English Bay and Port Graham.

20. Subtidal Monitoring Recovery of Sediments-Project No. 93047

This project involves recovery of hydrocarbons and subtidal sediments over a two year period. Oiled sites include the Sleepy Bay area which in turn, involves Chenega interests. Village residents have been picking up oil for three years, and are certainly capable of carrying out this project, and coordinate with their consultants and the agency. This project, while supported should be expanded to include the Kenai Peninsula in Windy Bay and Chugach Bay.

21. Coordinated Recreation Restoration Planning and Assessment

This project is whole heartedly endorsed. Mr. Sinclair, an employee with DNR, is to commended for taking the time to discuss the project with us, explain it to us, and obtain our views. We recommend that the project be expanded to include the National Park Service as a cooperating agency, and that Port Graham Corporation and English Bay Corporation be included in the overall plans.

RESUME
OF
THOMAS R. FINK

R E S U M E

Thomas R. Fink
6359 Colgate Drive
Anchorage, AK 99504

Telephone Home: (907) 333-7451

PROFESSIONAL EXPERIENCE:

1991 - 1992

General Manager, Environmental Services - Veco Environmental and Professional Services Co., Anchorage, AK

Responsible for business development and general management in environmental services such as oil spill cleanup, oil spill contingency planning, and site remediation; managed completion of oil spill contingency plan, managed negotiation and initiation of \$1,500,000 Federal hydrocarbon contaminated soil thermal treatment project and acquisition of \$700,000 thermal treatment machine; devised marketing and bidding strategies for site remediation business development.

1988 - 1990

**Director - Environmental, Safety, and Health Issues
ARCO Alaska, Inc., Anchorage, AK**

Responsible for coordinating and developing response on major technical, legislative and regulatory environmental issues (e.g. West Sak Environmental Impact Statement, Regional North Slope Risk Assessment on Reserve Pits, Federal Solid and Hazardous Waste Legislation, EPA Offshore Effluent Guidelines); revitalized Alaska Oil and Gas Association Environmental Committee as an influential lobby for responsible industrial development.

1988

**Manager - Environmental Science
ARCO Alaska, Inc., Anchorage, AK**

Responsible for managing a professional staff to perform all environmental studies and providing expertise on all technical and regulatory environmental issues.

1978 - 1988

**Manager - Environmental Conservation Department
ARCO Alaska, Inc., Anchorage, AK**

Responsible for coordinating all environmental activities of ARCO Alaska, Inc.'s oil and gas exploration and production in Alaska through management of a highly technical and professional staff. Served as chief environmental officer of ARCO Alaska reporting to President or Vice President.

Increased department staff size from two to six highly qualified, self-starting professionals in response to explosion of environmental /regulatory activity of federal and state governments. Assisted in coordination of ARCO image of environmental responsibility to local rural inhabitants of Alaska. Supervised acquisition of numerous state and federal permits for exploratory drilling.

- Managed compliance response for new Alaska solid waste regulations helping to demonstrate further federal regulation of Arctic oil field wastes is unnecessary; participated in preparation of API Arctic oilfield waste report intended to advocate state regulation of oil field wastes as non-hazardous.
- Managed intensive regulatory lobbying effort of new proposed solid waste regulations for State of Alaska. Negotiated regulations from \$900 million impact to \$40 million impact on North Slope oil and gas production.

- Coordinated cleanup of major chemical spill by an ARCO contractor which made enforcement action by the U.S. Environmental Protection Agency and application of Federal Superfund unnecessary. This reduced cost of cleanup and media exposure to a minimum.
- Department demonstrated Environmental Impact Statements were unnecessary and avoided the consequent delays on two major projects (field facilities and waterflood construction) in the Kuparuk oil field by a coordinated series of field studies followed by staged negotiations. Eliminating one-year delays on these projects with capital costs approaching a billion dollars constituted significant present value savings.
- Department supervised preparation of an Environmental Impact Statement (EIS) for Prudhoe Bay oilfield waterflood, secured from the U.S. Environmental Protection Agency and the Alaska Department of Environmental Conservation major PSD (federal air emissions) and NPDES (federal wastewater discharge) permits, and helped secure 404 (dredge and fill) permits. This was an environmentally controversial multi-billion dollar project. Prevailed in licensing the less expensive of two environmental alternatives at a savings of hundreds of millions of dollars.

1974 - 1978

**Senior Research Chemist - ARCO Production Research Laboratory
Plano, Texas**

Originated project to develop chemical dispersant process suitable for Arctic oceans; supervised this up to field test stage; limited experience consulting on oil field chemicals. Organized a physical chemistry program to develop surfactant formulations for applications to chemical flooding (enhanced oil recovery); designed and supervised construction of novel interfacial tensiometer; supervised core floods and chemical procurements for design of field test.

1972 - 1974

**Assistant Professor of Chemistry
University of Tulsa**

Reorganized undergraduate biochemistry program; introduced special physical chemistry applications course for biology and pre-medical students; one doctoral student completed dissertation; consulting with petroleum engineering and geology departments.

1970 - 1972

**Post-doctoral Research Fellow
Washington State University**

Further researched application of hydrodynamics and thermo-physical/chemical processes to protein and polynucleotide genetic materials; managed and taught summer general chemistry program.

EDUCATION:

Ph.D, 1970, Yale University; Biological and Physical Chemistry; Dissertation and three publications "On the Thermodynamics of Helix - Coil Transitions in Polynucleotides" - concentrated on the application of physical chemistry to the biological function of genetic materials.

B.A., 1965, Indiana University; Chemistry Major; Biology, Physics; Mathematics Minor.

OTHER:

Founding board member of the Wildlife Federation of Alaska (1984-1989), Member of Anchorage Community College Council (1985-1987), Consultant to U.S.S.R. Ministry of Oil and Gas Construction on Arctic environmental protection in Siberian gas fields (1989), Member Anchorage Municipal Water and Wastewater Commission (1990- 1992).

EXHIBITS



State of Alaska
Department of
Environmental Conservation

Certificate of Commendation

Chenega Village Corporation

In appreciation for your extraordinary work and commitment during the State of Alaska
response to the Exxon Valdez oil spill

Jon A. Davidson
Commissioner

Steve Provan
State On Scene Coordinator

Randolph Buehler
State On Scene Coordinator

Brynn
State On Scene Coordinator

EXXON COMPANY, U.S.A.

ALASKA OPERATIONS
POST OFFICE BOX 240409 • ANCHORAGE, ALASKA 99524-0409

O. R. HARRISON
GENERAL MANAGER

June 8, 1992

Mr. Chuck Totemoff
General Delivery
Chenega, Alaska 99574

Dear Chuck:

Enclosed please find a limited edition, 1992 FINSAP cap. This is a small thank you for your participation in the 1992 FINSAP program and for your role in managing the Chenega Village Corporation contract for the 1992 cleanup. Your crew finished everything that FINSAP identified as needing cleanup.

I'll be in Anchorage for a few more weeks, but I may not get to see you again. It has been a privilege and a pleasure for me to get to know some of the people from Chenega Village. My thanks to all of you for your help in making the cleanup operations work effectively.

My best regards for a safe, happy, healthy, and prosperous future.

Sincerely,

ORH:dm
Enclosure:

EXXON COMPANY, U.S.A.ALASKA OPERATIONS
POST OFFICE BOX 240403 • ANCHORAGE, ALASKA 99524-0409

Post-It™ brand fax transmittal memo 7671

of pages > 2

To Gail Evanoff	From Tam Kelley
Co.	Co.
Dept.	Phone #
Fax # 573-5135	Fax #

May 29, 1992

* Ms. Gail Evanoff
* C/O General Delivery
Chenega, Alaska 99574

Dear Gail:

The Chenega Village Corporation cleanup crew is doing a good job. As in 1991, we are pleased that we were able to make arrangements to maximize CVC's participation in the survey and cleanup operations. Hopefully, you feel that these arrangements have been beneficial to CVC.

Thanks to the very high level of cooperation and support from the U.S.C.G. and state officials, we have been successful in this effort to provide CVC with a way to participate. The effort expended in obtaining qualifications for 6-pack licenses is a good example of this. Since your participation in the survey and cleanup is fully compensated, this has provided an income opportunity for CVC.

In maximizing CVC participation, every effort has also been made to maximize cleanup opportunities for CVC. The use of two CVC crews last year and one this year has been the result.

In 1992, any remaining oil is extremely weathered. This oil is harmless to humans and to wildlife. There is no lingering threat. In areas of interest to CVC this oil is generally buried. There are no health factors and additional net environmental benefits that justify the intrusion or the cost of additional cleanup efforts.

The CVC representative on the FINSAP survey team requested cleanup on Evans 37-A and Latouche 20-B and 20-C. In my opinion, the F.O.S.C. issued a work order for these areas out of concern for the CVC interest, even though the cleanup effort by CVC resulted in a temporary limit on use of the area, by making the site less attractive in 1992 and in some environmental damage by disruptions to ongoing natural recovery.

Out of respect for CVC, these work orders were issued. All parties involved have made an all-out effort to cooperate with CVC. We interpret your letter to say that you will not approve the use of bioremediation material to accelerate the biodegradation process. We also interpret your letter to say that regardless of the work being done at Evans 37-A and Latouche 20B and 20C by CVC that as landowner, you will refuse to sign off these sites.

It has been great to start off the 1992 Prince William Sound fishing season with an all-time record herring catch. I hope that with the rest of us the people of CVC can rejoice in the excellent level of biological and aesthetic recovery in Prince William Sound and at the remarkably low level of remaining oil.

You will recognize that the current use of the CVC cleanup team is fully complying with the work order in the 1992 cleanup. As in prior years, the effort goes beyond the work order when appropriate to ~~accommodate~~ CVC interests.

Your letter implies that somehow the work orders are not being fulfilled or followed. Please be assured that this is clearly not the case.

Your letter would seem to imply that CVC opportunities are being limited. The work to date is a clear testimony to the fact that opportunities have been created to provide CVC with opportunities to the exclusion of others.

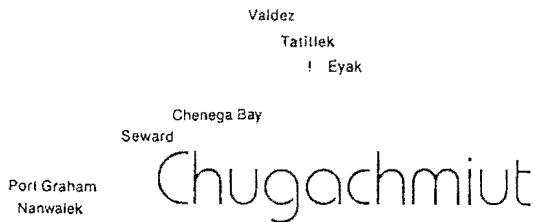
In my trip to Latouche 20 today, it was good to see the team in action. As discussed with Chuck Totemoff, we were able to get video of the CVC team in action.

Unfortunately, it was a somewhat gray and wet day.

Sincerely,


W. T. Kelley

WTK:dm



935-2311

November 20, 1992

Exxon Valdez Oil Spill Trustee Council
645 "G" Street
Anchorage, Alaska 99501

Dear Trustee Council Members:

On Monday, November 16, 1992, authorized representatives from: all seven Tribal Governing Bodies and all five Native Village Corporations in the Chugach region; the Chugach Regional Resource Commission; and Chugachmiut, the regional Tribal organization, met together and unanimously approved the following FY-93 project submittals and related matters, to your Trustee Council for consideration:

- A. Approved: The establishment of the Pacific Rim Villages Coalition by the Tribal Governing Bodies and Village Corporations of Chenega Bay, Tatitlek, Nanwalek and Port Graham, to contract 1993 and future EVOS Restoration Project funds.
- B. Approved: The "Coordinated Contract for 1993 Restoration work projects with the Pacific Rim Villages Coalition", a project proposal being submitted for the contracting of twenty-three (23) projects by the Pacific Rim Villages Coalition.
- C. Approved: In particular, of the projects included in the 1993 Draft Work Plan: Project #93019: the Chugach Region Village Mariculture project; and Project # 93020: the Bivalve Shellfish Hatchery and Research Center, with the requested funding needs for this second project being increased to \$136,900.
- D. Approved: The following new projects which the represented Chugach Entities plan to submit by November 20, 1992, or at a later date:
 - 1. The Chugachmiut Cultural Heritage Preservation and Perpetuation project;
 - 2. The Windy Bay Clam Replacement project;
 - 3. The Nanwalek Sockeye Enhancement project;
 - 4. The Port Graham Salmon Hatchery project;
 - 5. The Tatitlek Ferry Terminal project;



6. The Tatitlek Breakwater project;
7. The Chenega Bay Marine Service Center project;
8. The Chenega Bay Old Village Site Restoration project; and
9. The Native Village of Eyak Habitat Acquisition project.

Concerning these and all other submitted projects, there was a strong consensus among the above mentioned parties at the November 16 meeting, that in the contracting and implementation of these and future projects, maximum steps should be taken: to use regional Native Contractors; to hire regional Native residents in accordance with local hiring practices; and to provide regional Native residents with the employment training necessary for developing the technical skills required for working on many of the projects.

Chugachmiut, as an involved organization at the November 16 meeting, strongly endorses the united action that was taken concerning all the above approved projects and the Pacific Rim Villages Coalition.

Thank you for your anticipated approval of funding for our recommended projects.

Sincerely,

CHUGACHMIUT



Richard A. Rolland
Executive Director

JP:cs

EXXON VALDEZ OIL SPILL PROJECT DESCRIPTION

Project Number:

Project Title: Cultural Heritage Preservation and Perpetuation

Project Category: Restoration Management Actions

Project Type: Cultural Education

Lead Agency: Chugachmiut Regional Tribal Organization

Cooperating Agencies: Department of Agriculture, Forest Service; Department of the Interior, National Park Service, (If it is required that a federal or state agency be the lead agency, it is recommended that this be the Forest Service, with the bulk of the funds being contracted to Chugachmiut).

Project Term: January 1, 1993 - September 30, 1997

INTRODUCTION

A. Background on the Resource/Service

The subsistence use of fish and wildlife, which is recognized as constituting a vital natural resource that was severely injured by the EVOS, cannot be separated in the Chugach Region from the perennial task of presenting, preserving and perpetuating the Alutiiq cultural heritage which also was severely impacted. Indeed, as a living culture, the Alutiiq patrimony primarily is transmitted from the tradition bearers to the young, through the latter's immersion into the subsistence life style practices of their elders. Therefore, the partial destruction and interruption of the Alutiiq subsistence life style stemming from the EVOS, of its very nature, has resulted in a diminishing of cultural identity among the young. This, in turn, has occasioned a host of personal and community problems. Accordingly, due to the extent of the damage to the Alutiiq cultural education transmission process, measures being taken to resolve the problem solely through the replenishing of fish and game stocks for subsistence use, are both insufficient and inadequate. For the subsistence cultural heritage in the Chugach to be restored, there exists the immediate need to have the Alutiiq tradition bearers present this patrimony to the young via local and regional Elders - Youth conferences; for the Youth to preserve this testimony through dialogue and reflection on what best can be adapted to their contemporary lines; and for them to inherit and perpetuate this testimony, in practice, through an intensive living experience of the Alutiiq subsistence cultural heritage in seasonal Youth Spirit Camps.

B. Summary of Injury

The damage to the subsistence, cultural heritage transmission process is evident in the Village communities from the constant questioning by the Youth of their cultural identity. This is manifest in their lack of self-confidence and their perceived inability to be independent providers of their own subsistence needs. This personal insecurity leads to a further questioning of their capability to succeed, without an excessive reliance on entitlements, in the larger society which encourages them to be dependent consumers within a money economy. The sense of frustration concerning their ability to be independent providers, has resulted in an increased number of Youth becoming dependent on substances as a means of relieving their anxiety. This phenomenon is well documented in the files of the Chugachmiut Health and Social Services Department. In 1990, the people in the 7 Chugachmiut Village communities formed a Cultural Heritage Advisory Committee to Chugachmiut and petitioned that action be taken on a regional level to overcome the EVOS damage to the Alutiiq cultural heritage perpetuation process, particularly in regard to the plight of the Young.

C. Location

The Cultural Heritage preservation project will involve the following Chugachmiut Village communities: Mt. Marathon Native Association (Seward), Chenega Bay, Tatitlek, Valdez Native Association, the Native Village of Eyak (Cordova), Port Graham, and Nanwalek.

WHAT

A. Goal

The goal of the project is to restore the Alutiiq Cultural Heritage transmission process which was severely damaged by the EVOS; namely, the unique cultural education, presentation, preservation and perpetuation process whereby Alutiiq Youth inherit the subsistence cultural patrimony from their elders.

B. Objectives

- A regional Elders - Youth Conference will be held by Chugachmiut in July for five successive years, at which Alutiiq Elders will present the essential elements of the cultural heritage tradition to the gathered Youth.
- The assembled Youth at the annual conferences will preserve as witnesses, the testimony of their Elders through dialogue with their Elders and discussive reflection on this testimony within their own peer groups. They also will preserve this testimony on audio and video tape for use as an education and interpretive study resource within the Alutiiq communities.

- The gathered Youth, immediately following the Elders - Youth Conference, will inherit this patrimony in practice and become its living perpetuation, through their involvement and participation in a minimal, 10 day Spirit Camp experience wherein they will reflect together on their cultural identity and work together to provide for their own subsistence needs.
- That career awareness opportunities in the cultural resource management sciences might be provided to regional Youth at the Spirit Camps by federal and state as well as Chugachmiut representatives.
- That the preserved audio and video tapes be made available to regional schools and the state university system as an educational and interpretive resource witnessing to the authentic Alutiiq cultural tradition.
- To evaluate, over a period of five years, the positive influence the combined Elders - Youth Conferences and Spirit Camps have on Youth becoming independent providers of their own future needs.

WHY

The project will restore the Alutiiq subsistence and cultural heritage transmittance process that was severely injured and interrupted by the EVOS; and which cannot be restored only through the replenishing of subsistence use fish and game stocks. It will provide Alutiiq adolescents and young adults with the opportunity to obtain or regain a sense of cultural identity and the related positive characteristics of individual self-worth, personal identity, social growth, confidence in their innate abilities and youth leadership. It will effect a bonding between the tradition bearers and the young which is so essential for the survival and development of village society. It will enable regional Youth to preserve and perpetuate their cultural heritage through an intensive, practical involvement; while providing the Elders with the opportunity to present the Alutiiq cultural testimony to the Young in a concentrated effort. It will render federal and state agencies the opportunity to present career awareness training sessions (such as archaeological digs) to regional Youth. The project will give Chugachmiut the necessary resources to properly evaluate the extent to which its cultural heritage program efforts assist in preventing Alutiiq Youth from developing dependent personalities. It will provide regional communities and state educational institutions with an accurate educational and interpretive testimony of the Alutiiq cultural heritage. The project will forge positive working relationships between Chugachmiut, the seven regional Alutiiq communities, the Chugach Alaska Corporations, local village corporations, other non-profit regional organizations, plus federal and state agencies, as they work together to restore the Alutiiq subsistence cultural heritage process damaged by the EVOS.

How

The Chugachmiut Cultural Heritage Advisory Committee, the Chugach Heritage Foundation and the Chugachmiut Department of Planning, Program Development and Evaluation, working closely with staff of the Chugach National Forest and the National Park Service, will conduct a combined Elders - Youth Conference and Spirit Camp program each July from 1993 through 1997. It is envisioned that a permanent Spirit Camp site eventually can be established at Nuchek on Hinchinbrook Island in Prince William Sound. Nuchek is a former Russian-Native site which is rich in archaeological material. At least 30 Elders and 40 Youth will participate annually in the projects. The program coordinator will be the Director of Planning, Program Development and Evaluation at Chugachmiut. Inasmuch as each Village community will have a representative number of Elders and Youth at each Conference and Spirit Camp, the 7 Chugachmiut villages actively will be involved in the development of the entire program. Since the Nuchek site is on land conveyed to the Chugach Alaska Corporation and because the Chugach Heritage Foundation will be performing ongoing archaeological work there during the holding of the Spirit Camp, all the key regional organizations will be involved in a combined cultural heritage program effort.

ENVIRONMENTAL COMPLIANCE

The proposed program consists of two non-intrusive projects that appear to qualify for a categorical exclusion from the requirements of the National Environmental Policy Act.

WHEN

The actual conducting of the regional Elders - Youth Conference by Chugachmiut for a minimal 3 day period within the region, will take place each July from 1993 through 1997. Each of these years, the Conference immediately will be followed by the holding of the Spirit Camp, also operated by Chugachmiut, for a minimal 10 day period. The assessment of each project will be completed by mid-August. Program development work to improve the program will be performed on an ongoing basis.

BUDGET

Chugachmiut's budget for the five year program cycle would be \$445,000, with \$105,000 required for July, 1993, and \$85,000 for each of the subsequent four years. Participant travel related expenses would be the main annual budget category cost with Participant travel related costs for July, 1997 being \$45,004.

EXXON VALDEZ OIL SPILL PROJECT DESCRIPTION

Project Number:

Project Title: Tatitlek Breakwater

Project Category: Small Boat Harbor Protection

Project Type: Damaged Service Compensation

Lead Agency: Alaska Department of Transportation & Public Facilities

Cooperating Agencies: Tatitlek Village IRA Council, Tatitlek Village Corporation, Chugach Alaska Corporation, Forest Service

Project Term: January 1, 1993 - September 30, 1994

INTRODUCTION

A. Background on the Resource/Service

The Exxon Valdez Oil Spill has had a marked, negative effect on the wild production of Pink Salmon in Prince William Sound, which, despite the high return of hatchery produced salmon during 1990 and 1991, eventually resulted, in 1992, in a poor pink salmon commercial and subsistence catch within the Prince William Sound. Moreover, given the prevailing conditions, it has been concluded that the increased egg mortality observed since the spill, is a continued threat to the wild pink salmon production in the Prince William Sound. This wild production of pink salmon and the resultant, annual, commercial and subsistence fisheries harvest, was an immeasurable service to Prince William Sound Alutiiq communities, including Tatitlek; and now, that service has been damaged by the EVOS and possibly lost. To compensate for this, hopefully only severely injured and interrupted service, on which the livelihood of Tatitlek residents has depended, the Tatitlek Village requires improvements in commercial fishery related infrastructure if its already damaged commercial fishing industry is to survive. The most needed infrastructure improvement is the construction of a breakwater for the commercial fishery fleet so that the harbor at Tatitlek safely could hold approximately 96 vessels. A breakwater feasibility study was conducted in 1981 and the conclusion made that a breakwater to protect the harbor was both needed and feasible. Prior to the EVOS, Tatitlek's commercial fishing industry could manage to survive without the breakwater; now, with the injured and lost service resulting from the EVOS, the ability of the commercial fishery fleet to survive without this harbor infrastructure improvement, is in doubt.

B. Summary of Injury

The summer, 1992 commercial fishery catch of pink salmon in PWS, from all reports, was poor. Since Tatitlek, like other Alutiiq villages in the PWS area, largely is dependent on the cash income

the pink salmon commercial fishery season ordinarily creates for the year-round cash needs of the residents, the poor 1992 pink salmon harvest will have harsh repercussions through the winter and spring months. Further, with the anticipated, continued weakening of the wild pink salmon stock, stemming from the EVOS, the future commercial fishery outlook appears bleak. Additionally, storm damage to Tatitlek commercial fishery boats continues to be extensive; damage which could be prevented if the breakwater was in place. The infrastructure construction of the breakwater appears necessary now, more than ever, if the commercial fishery at Tatitlek is to remain viable.

C. Location

Tatitlek Village, Alaska.

WHAT

A. Goal

The purpose of this project is to safeguard and protect the economic viability of the commercial fishery industry at Tatitlek (already weakened by the damaged pink salmon harvest consequent to the EVOS) through the construction of a protective boat harbor breakwater.

B. Objectives

1. To construct, according to Plan B of the 1981 Breakwater Feasibility Study, a rock rubble breakwater with a top elevation of 22' which would extend some 800' directly west from the "South Breakwater location" point, and then stretch diagonally another 800' north-northwest.
2. To determine if the rock rubble for the embankment and the armor rock to protect it, needs to be barged from an existing quarry in Valdez or whether a land-based rock quarry could be established in the immediate area.
3. To reduce construction costs by using Plan B of the 1981 Breakwater Feasibility Study, a design which uses natural rock outcroppings to minimize fill quantities while providing maximum protection and capability for harbor expansion.
4. To provide local breakwater construction employment to 20 Tatitlek residents.
5. In response to community review of the breakwater design: to construct an additional small breakwater from the point north, northwest of the village where a small reef extends to near the end of the proposed breakwater; in order to provide better north or northwest wind protection.

WHY

The "Plan B" design will provide maximum protection to the Tatitlek commercial fishery fleet by safeguarding from northwesterly winds as well as from the refracted waves rising from the principal southerly direction. The breakwater design provides additional provision for later

expansion. It makes maximum use of natural, existing rock outcroppings. It is the most cost effective in terms of providing the greatest fleet protection for the least expense. It already has been determined as necessary and feasible through a series of studies and Village input. It would appear to require the least additional field work to establish specific bottom conditions.

The construction of the breakwater is necessary to Tatitlek Village since, unless there is this commercial fishery harbor infrastructure improvement to compensate for the serious harm done to the wild pink salmon run by the EVOS, it will be most difficult for commercial fishing at Tatitlek to remain a viable income producing enterprise for its residents.

How

The Tatitlek Village IRA Council will take the lead role in implementing Plan B of the 1981 Feasibility Study with a recording role being taken by the Tatitlek Village Corporation. Within a six month period, a determination will be made whether the armor rock for the project must be barged from Valdez, a course of action which is assumed in the budget. A further project development-implementation plan would be designed to include: the mobilization of work barges and materials, the shipping of the rocks and their placement, the installing of floats for the slips and walkways, the pile-driving which would be required and the overall manpower needs and scheduling needed to complete the project. The Alaska Department of Transportation would monitor all work performance.

ENVIRONMENTAL COMPLIANCE

Compliance approvals, as required, will be obtained from the EPA by March 31, 1993.

WHEN

January 1 - May 31, 1993. Study and determination whether stone for project will be barged from Valdez; completion of overall construction/architect's plan including all rock placement plans.

June 1 - November 30, 1993. Completing and coordinating efforts for quarrying and transportation of stone; selection of general contractor and identification of work force with emphasis on local Village labor; ordering of materials for boat slips - floats; procurement of timber for pilings.

April 1 - April 30, 1994. Delivery and treatment of wood pilings.

May 1 - September 30, 1994. Construction of breakwater.

September 15 - 30, 1994. Completion of all payments, financial statements and project reports.

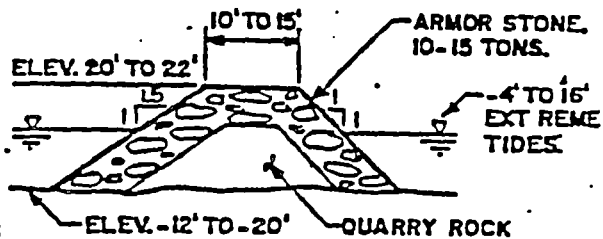
BUDGET

The total cost, in 1981, was computed to be \$9,630,000. At 1992 costs, the project will require a budget of \$10,500,000. (See attached Feasibility Study, page 12).

1981 SUMMARY (rounded to \$10,000)

1.	Mobilization	\$170,000.
2.	Rock for Breakwater	7,600,000.
3.	Floats (40 boat slips)	290,000.
4.	Piles	50,000.
5.	Crew lodging and food	110,000.
6.	Demobilization	<u>150,000.</u>
7.	Subtotal	8,370,000.
8.	Profit & Overhead (15%)	<u>1,260,000.</u>
9.	TOTAL	\$9,630,000.

CAWINWORDUOHMBREAK.VOS



SECTION A

EXISTING DOCK

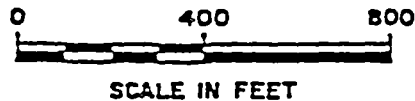
TATITLEK VILLAGE

INDIAN RESERVE

4-24 BOAT FINGERS (96 BOATS).

ROCK RUBBLE BREAKWATER.

TATITLEK NARROWS



TATITLEK
BREAKWATER STUDY

PLAN B SHT. 3

92-0156

JUN-15-92 MON 13:09

TNPR

FAX NO. 9075832891

P. 01

CHENEGA BAY I.R.A. COUNCIL

JUN 15 REC'D

reply to: --- Chenega Bay
--- Anchorage

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<input type="checkbox"/>	D-PAG
<input type="checkbox"/>	E-MISC.

June 15, 1992

Exxon Valdez Trustee Council
645 "G" Street
Anchorage, Alaska 99501

VIA FAX NO.: 276-7178

Dear Council Members:

Attached is a Restoration Project which will provide economic opportunity to replace lost subsistence resources for the residents of Chenega Bay. We are recommending that you fund construction of the Chenega Bay Marine Service Center.

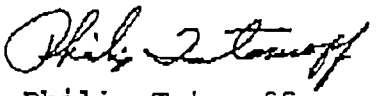
As you know, Chenega Bay was heavily impacted by the spill. Among other things, all local government administrative systems were disrupted and for the most part destroyed. Opportunities for building on the existing systems were missed and lost. We are currently in the process of rebuilding our local government administration.

We have also been doing preliminary planning for the Chenega Bay Marine Service Center. You will see on the attached project description, that market studies and a feasibility study have been done. We plan to have Peratrovich, Nottingham prepare an Executive Summary, which will outline the infrastructure needs, layout and costs for the project. We expect the Summary to be completed by October 1992. This has been/will be paid for with funds from the Administration for Native Americans (ANA), USHHS, special oil spill impact funds.

We have hired Lynn Chambers as our Economic Development Planner with funds from the same ANA grant. You may contact her for additional information about this project at 562-4155 in Anchorage.

Good luck with your work. You have quite a responsibility.

Sincerely,



Philip Totemoff
President

Document ID Number
920613274

- ☐ A-82 WPWG
☒ B-83 WPWG
☐ C-RPWG
☐ D-PAG
☐ E-MISC.

EXXON VALDEZ OIL SPILL TRUSTEE COUNCIL
RESTORATION PROJECT

Title of Project:

CONSTRUCTION OF THE
CHENEGA BAY MARINE SERVICE CENTER

Justification:

We want to replace lost subsistence resources with economic opportunity. Examples of the reduced resource, taken from Alaska Fish and Game records, expressed in terms of pounds per person in Chenega Bay, are:

Year	Fish, other than salmon	Marine invertebrates	Sea mammals
85-86	62 lbs	6.9 lbs	140.3 lbs
89-90	26.1 lbs	0.3 lbs	3.6 lbs
90-91	24.8 lbs	1.4 lbs	27.5 lbs

The resource is harder to get because of the decrease in availability. The octopus dens are empty, commercial fishermen occasionally bring us octopus taken at 60 fathoms in the Gulf. We have decided not to take birds or their eggs because there are very few and we want to give them time to recover. Also, many of those that are around are not in good health and need time to get better. Health Services has told us not to take shell fish from contaminated beaches. Our people have been working to clean-up the beaches, not only for the money, but most importantly to get the oil off the beaches so that marine life can return.

Description of Project:

The goal of the project is to replace lost subsistence resources with economic opportunity. Secondly, to open Western Prince William Sound to recreation and tourism users.

The objectives are to provide services to the PWS and Gulf of Alaska Commercial fishery and the growing recreation and tourism markets.

Chenega Bay is located midway between Whittier and Seward, with an excellent natural harbor, at the heart of the salmon-spawning habitat where the Prince William Sound fishing fleet harvests 48% of all salmon taken in Alaska, and is at a gateway for tourists and recreational boaters to the western part of Prince William Sound. At the present the visitor market is shut out of this whole area due to lack of harbor, fuel and supply services.

Document ID Number 9206/5274	<input type="checkbox"/> A-12 WPWG	<input checked="" type="checkbox"/> B-13 WPWG	<input type="checkbox"/> C-14 WPWG	<input type="checkbox"/> D-PAG	<input type="checkbox"/> E-MISC.
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Steve Grabacki of Graystar Pacific Seafood, Ltd. conducted a market study of the fishery near Chenega Bay in January 1991. Ogden Beeman & Associates, Inc. completed a Market Demand Study of the commercial fishery and potential tourism and recreational use of the CBMSC in Feb. 1992. Mary Spellens of the Minority Development Corp./Community Enterprise Development Corp. is about to complete a Feasibility Study of the CBMSC based upon the Grabacki and Beeman reports.

A draft of the feasibility study demonstrates that the CBMSC shows very good potential for additional dock and moorage space, a deep draft dock, small tidal repair grid, open rental storage, marine fuel sales, groceries and marine supplies, limited boat repair, amusements, showers/laundry/phones, restaurant and a 15 room hotel.

Once the feasibility study is finalized, Peratrovich, Nottingham and Drage, Inc. will work with the residents of Chenega Bay to prepare an Executive Summary, which outlines the infrastructure required, location of infrastructure, cost of each component and recommended phases of development.

We are recommending that the Trust provide construction funds for the Chenega Bay Marine Service Center. The initial plan calls for construction of a deep draft dock, additional dock and moorage space, tidal repair grid, marine fuel dispensary. And, upland facilities to provide space for grocery and marine supply sales, minor boat repair, amusements, shower/laundry/phones and a restaurant and hotel.

Estimated Duration of Project:

Three years to construct dock and upland facilities.

Estimated Cost per Year:

Dependable cost estimates for each year of construction will be available by October 1992. Early estimates of total cost indicates a range of between \$6 million and \$8 million.

Respectfully Submitted by:

Philip Totemoff

Philip Totemoff, President
Chenega Bay IRA Council
P.O. Box 8079
Chenega Bay, Alaska 99574
(907) 573-5132

For additional info. contact:

Lynn Chambers
Economic Development Planner
3300 C Street
Anchorage, Alaska 99503
(907) 562-4155

93325157

November 20, 1992

Exxon Valdez Oil Spill Trustee Council
645 G Street
Anchorage, Ak. 99501

Dear Sirs:

I am writing to submit public comment on the Oil Spill FY93 Work Plan.

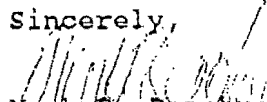
As one of many Kodiak residents who derive our living from the water and the health of our aquatic resources I am concerned that the restoration seems to be proceeding according to political and legal priorities with not enough regard for the complexities of the impacted food webs and systemic health of commercially underutilized, or not readily observable, populations in areas removed from the immediate spill area- particularly the Alaskan Peninsula.

There is the impression that too much money is being spent on the politically popular projects such as the Fort Richardson Project and the agency bureaucracies of members of the Trustee Council. It is also politically and legally popular to assume that the EVOS will be effectively mitigated with the amount of funding available within the ten year framework.

The Council might instead place more emphasis on a long term approach to dealing with environmental impacts of the EVOS that are not well understood by researchers and aquatic resource managers. I support an endowment such as the proposal by Sen. Arliss Sturgulewski and the funding of facilities that will allow us to research, restore and enhance aquatic resources far into the future in a systematic process based on an understanding of the aquatic resource in question. After the oil has been depleted our water quality and the effective management of these aquatic resources will be essential to the economic well being of coastal Alaska.

I appreciate the opportunity to voice my opinion.

Sincerely,


Mark R. Donohue

Sierra Club

Alaska Field Office

241 E. Fifth Avenue, Suite 205, Anchorage, Alaska
(907) 276-4048 • FAX (907) 258-6807

Post-It™ brand fax transmittal memo 7671

of pages 34

To	Dave Gibbons	From	Pam Brodie
Co.	Exxon Trustees	Co.	Sierra Club
Dept.		Phone #	276-4048
Fax #	258-9860	Fax #	258-6807

9:325158

November 20, 1992

Exxon Valdez Oil Spill Trustee Council
645 G Street
Anchorage AK 99510

RE: 1993 Draft Work Plan

Gentlemen:

Thank you for the opportunity to comment on the 1993 Draft Work Plan for the Exxon Valdez Oil Spill Restoration. Oil spill restoration is a high priority for the Sierra Club.

The Sierra Club is nonprofit environmental organization with approximately 2,000 members in Alaska and 600,000 members nationwide. We offer these comments:

Habitat Protection Fund #93064

Habitat protection should be the priority use for restoration dollars. It provides the most all-inclusive restoration for damaged resources and services, it is generally the most cost-effective approach, and it enjoys the most popular support. We appreciate the inclusion of Project Number 93064 but believe it need a number of improvements:

- The \$20 million figure is insufficient. The Trustees should immediately purchase the private land and development rights within the borders of Kachemak Bay State Park. The negotiated price of this area alone is \$22 million, so the number should be considerably higher than that. There is more money available, both remaining from the 1992 budget, and in the 1993 budget.

- The Trustee Council should direct staff to immediately begin dialogues with all private owners of large tracts of land, timber, and subsurface rights in southern coastal Alaska. They should determine as soon as possible whether and under what conditions the owners are willing to sell, and the asking prices.

We are afraid the Trustees are making a serious mistake by pursuing the process of choosing priority areas before talks with the owners begin. In the first place, this will almost certainly drive up the price of the priority land. Secondly, the staff may spend considerable time and money to narrow the priorities to specific small critical areas, only to find later that only large

Trustee Council
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sections are for sale. There is no use setting priorities before we know what is available.

- Land and timber rights should be acquired in large sections, including whole watersheds at least. Acquisition of small areas (such as buffer extensions) might benefit certain damaged species, but would not benefit such services as recreation, tourism, wilderness, and aesthetics, and it would ignore the functioning of the larger ecosystem.

- Acquisition should not be limited to areas with imminent threat alone. Focusing on imminent threat coerces owners to threaten logging and subdivision in order to get attention. It would be especially foolish to limit acquisition to areas which have already acquired logging permits. The more the owners have spent on their land, the higher the prices they are likely to demand. Instead of imminent threat, the Trustees should adopt an interim process which responds to opportunities as well as threats. Owners who come forward with offers to work cooperatively with the Trustee Council should find the process open and receptive.

Natural Resource Services

The damage assessment and restoration process have focused almost entirely on losses of specific natural resources, particularly on salmon and other charismatic animal species. There has also been some attention paid to subsistence and archaeological resources. Other services have been largely neglected.

The Trustee Council should conduct projects to assess the damage to services and to plan appropriate restoration. Damage assessment and planning should include the public both within and outside the oiled communities. Pristine wilderness in the Alaskan rain forest is important to many people throughout the country and the world, even if they never expect to come here -- just as the environmental health of the tropical rain forests, for example, is important to many Alaskans who will never have the opportunity to visit them.

Also, economic damage assessment information should be released to the public immediately. This should give some indication of the public's assessment of the services lost and their value.

Government Reimbursements

No where in the Draft 1993 Work Plan is there any discussion of the amount of reimbursement to be made to the federal and state governments for past expenses. Last year, the Trustee Council

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reimbursed approximately \$54 million without prior public notification or opportunity for comment. Reimbursement decisions should be open to public comment, just like other expenditures.

We believe that the state and federal governments should not seek reimbursement for past expenditures since they bear some responsibility for the tragedy. If they must be reimbursed, the rate should be at no more than 10% per year, and preferably with the larger share of reimbursements coming from later years of the settlement payments. Although the most critical need for restoration is closer to the time of the spill, at least four years will have passed before any substantive restoration occurs.

Cost containment

All projects should be subject to competitive bids. This is the most important single way to reduce costs. There is an inherent conflict of interest in having agencies propose the projects, calculate the budgets, recommend priorities to the Trustee Council, and then implement the projects. Although the peer reviewers provide useful information for judging priorities, they probably have insufficient information for judging costs.

All expenditures should be audited, including reimbursement for expenses incurred before the settlement.

Criteria for Judging Projects

Clearly, no project should be approved which does not meet the definition of restoration in the settlement.

In addition, the Trustees should not fund projects which would fall under the duties of the agencies if the oil spill had not occurred. The spill settlement must not be used as a supplement for funding for agency budgets.

Specific Project Recommendations

We recommend that the following projects not be approved:

#93009 Public information, education, and interpretation -- This goal is very well served by the traveling exhibit of Homer's Pratt Museum. The goals of this project do not justify the expense.

#93010 Reduce disturbance near murre colonies -- This project seems unlikely to have much success.

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#93011 Develop harvest guidelines -- This is part of the regular duties of the Dept. of Fish and Game; oil spill funds should not be necessary.

#93022 Evaluating the Feasibility of enhancing productivity of murre by using decoys, dummy eggs, and recordings of murre calls -- Such intense, intrusive human manipulation seems unlikely to be effective or efficient. Such a project might be appropriate to attempt to rescue a threatened or endangered species, but is inappropriate in this case.

#93026 Fort Richardson Hatchery Water Pipeline -- Of all the projects, this stands out as the one most deserving of elimination. As Dr. Spies points out, "There appears to be insufficient independent review of the risks to natural runs of salmon and other fishes"

#93028 Restoration and mitigation of wetland habitats -- It is far more efficient and effective to protect existing threatened habitat than to try to create new habitat.

#93029 Prince William Sound Second Growth Management -- It would be far more efficient and practical to protect existing old growth than to extensively manage second growth to speed succession.

#93030 & 93031 Red Lake Restoration & Mitigation -- Introducing hatchery fish into natural stocks risks spread of disease.

#93050 Update -- This does not belong as a separate project. It is part of the regular agency administrative activities.

The failure to list a project here should not be interpreted as support for that project. In many cases, we are not, at this time, sufficiently knowledgeable to judge the projects.

Thank you for your attention.

Sincerely,



Pamela Brodie
Associate Alaska Representative

Carol A. Jensen
8451 Greenhill Way
Anchorage, Alaska 99502

93327159

November 19, 1992

(807) 344-7078 272-4366 (DAY)

Draft 1993 Work Plan Comments
Exxon Valdez Trustee Council
645 G Street
Anchorage, AK 99501

Ladies and Gentlemen:

Generally, I do not believe most of the proposed projects meet the criteria of the Memorandum of Agreement that states the money should be used for "restoring, replacing, enhancing, rehabilitating, or acquiring...." Most of the projects entail further, on-going studies and research that has already been done, sufficiently to warrant ACTION as opposed to more "study". I began reading the draft with an open, objective mind. I had no preconceived ideas or expectations. However, before I had read more than a half dozen proposals, I began to get angry. These projects represent a way to keep government and contractual workers on the job, studying habitat and a myriad of other mammals, fish, etc. that have already been studied and conclusions drawn. It seems to be an enormous waste of time and millions of dollars to continue those studies. The only benefit derived seems to be to the pocketbooks of those on the payroll. Some are only proposed to go for one or two years more. In that amount of time I don't believe they would discover anything they haven't found out in the last three or more years. I am strongly opposed to studies that extend beyond two years. I can foresee these agencies frittering away millions of dollars on on-going studies and monitoring that is not needed. What is needed NOW and in the future is habitat restoration, protection and acquisition. In other words, ACTION. Some of the studies are to further research problems that existed before the spill. Examples: the decline of the harbor seals; habitat and escapement problems with salmon in upper Cook Inlet and Kodiak Island. Historic and ongoing mismanagement and failure to admit this fault and take corrective action sooner should not be rewarded by funding through the EVOS fund.

Some of the projects are duplicated in one or more other projects. They have been given different names and disguised with fancy jargon, but reading between the lines, it becomes obvious that several projects could be combined into one, saving time, money and consolidating into one agency. I don't think any project should involve more than one agency. Certainly the agencies should share their information. For example, you have a few different projects that use hundreds of thousands of dollars for educational campaigns. This should be covered under ONE PROJECT entitled "Education" and handled by one agency, at a cost far below the separate projects. Projects studying and monitoring all fish species should be combined into one project and the same criteria and tests used for all. The same with ducks, murres and other birds. We know there are still vast areas where "trapped" oil dominates the food supply and is still either killing fish and wildlife or curtailing their reproduction. Spending millions of dollars more to study this to death and then some will not solve the problem.

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Additional cleanup projects are not wise in many areas, since the initial cleanup activities have been ineffective and even injurious (to some wildlife species that are extremely sensitive to disturbances of any kind). The end result of many of these proposed projects seems to be heading toward more cleanup as a solution.

Trapping, hunting and fishing is continuing in many areas where species have been depleted and are continuing to decline. These activities should be stopped immediately. Otter and harbor seal populations could benefit greatly from reduced or eliminated hunting, trapping and fishing, including subsistence. Most subsistence activity is large scale fishing, which kills marine mammals as well as the fish.

The destructive forces of mining and logging have been identified not only by this draft, but in many other studies. Steps should be taken NOW to curtail this destruction through laws, habitat acquisition and protection. While not as instantly destructive as a disaster such as the Exxon Valdez spill, the long-term destruction throughout the entire state of mining and logging is just as devastating to the environment.

Projects to fund actual acquisition of threatened habitat are glaringly absent, probably because they would not be revenue producing for the various government agencies and their contractors. For example, the public overwhelmingly supported the Kachemak Bay buyback, but it was not funded by the State. It should be funded by this spill fund, since it fits the criteria for funding perfectly. Other areas throughout PWS should be purchased and protected from the destructive mining and logging industries, and intrusive tourism, trapping, commercial fishing and sport hunting. Buffer zones around streams and lakes should be established NOW before it's too late. Since these government agencies are chomping at the bit and straining with both hands out to grab onto this fund, some of the money should be used to monitor incidental killing of marine mammals by commercial and subsistence commercial fishing fleets. This could give them some frightful insight on the decline of marine mammals.

The bulk of the fund should be spent on actual projects that will ACTIVELY rehabilitate, restore, and enhance the habitat, food supply, and wildlife of PWS first, and other areas of the state (such as Kachemak Bay forest buyback) that are in great danger of total destruction. Fish hatcheries are another active way restoration can be established. The funding of ongoing studies where we have already studied and drawn conclusions (which is what most of the projects are for), should not be allowed.

I think it is very unfortunate that all the projects in the draft were proposed by government agencies that stand to benefit from the influx of this funding.

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There is not one proposal from the public included, be it an organization or individual. I find it hard to believe that out of 450 ideas, at least a few from groups or private citizens were worthy of inclusion. I believe the proposals amount to grants for unnecessary, duplicative study and cause a dangerous delay to, if not elimination (due to depletion of funding spent on studies) of the actual remedial action that is necessary.

Following are brief comments on specific proposals.

#93002: This project has a year long term, but the "When" section indicates they will continue beyond 1993. Many studies are worded like this. You may think you're approving a one or two year program, when in fact, it could indefinitely drain the fund. This, like most of the projects, "studies" and "assesses" what is already known as to why there is a problem with sockeye salmon fry in Cook Inlet and Kodiak Island.

#93003, 93004 are carryovers of #93002 and should not be funded. See above comments.

#93005: Multi-agency involvement leads to waste and inefficiency. This project cannot possibly be justified under the terms of the Agreement for this fund. If the Natives are concerned about damage to archeological sites (which I doubt will happen now that cleanup activities have ended; no one has the time, interest or knowledge to disturb them), then they should fund whatever "educational" process they deem appropriate. This is a waste of money to keep the NPS folks occupied. Actually, the more information made public about these sites, the more risk you bring. Just keep mum and chances are no damage will result.

#93006, #93007, #93008: More wasted money. Why should we spend over \$259,000 to monitor archeological sites for 10 years? This is a flagrant misuse of public money to line the pockets of a few workers, and will not benefit the public, wildlife or habitat. How do they plan to "restore" archeological sites (put in some new "old" bones?)? I do not believe these sites are a "major part of the cultural heritage of the United States". These projects also call for more study of information that has already been collected. Again, these projects are appropriate for affected Native corporations to undertake if they believe it is worth the time and money. (I doubt they would.)

#93009: This duplicates much of #93005 and is not needed. There have been countless video tapes, books, brochures, etc. already published on these topics. Why waste more money for the next four years to continue pumping more material than the public will ever digest? The only reason I can see is to again line the pockets of a few Forest Service employees and contractors.

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#93010: In order to achieve the objectives of this project, you don't need to spend \$56,000. All you need to do is get the various State and Federal agencies to restrict ship and plane activities in murre nesting and breeding areas. Further study is not needed. In fact, the actual research probably contributed to the failing of the reproductive cycles.

#93011: Why is legal harvest of harlequin ducks continuing if the species is so depleted? You don't need \$11,200 to study what you already know about the depletion of ducks and otters or to manipulate seasons and bag limits--that can be done now through the Board of Game and Fish & Game Dept., emergency closures, etc. Subsistence users should be monitored and required to report harvests. However, harvesting should not be allowed until the populations have recovered.

#93012: This is more duplication of studies already covered. There were problems with the mismanagement the lakes before the spill, which caused the problems herein.

#93014: Another unnecessary study being done to keep people working.

#93015: Low escapement can be corrected by limiting the commercial/subsistence fishing. Since the Board of Game refuses to do this, Fish & Game needs to accomplish it. This is an extremely expensive, duplicative, unnecessary project that will not increase stock or rehabilitate habitat.

#93017 & 93018: This covers sample collection and public meetings that have already been done. Publicize the assessment studies that have been done; don't repeat or do more of the same. Any studies that are approved to research salmon and trout should be combined into one study to save money, employees and time.

#93019 & 93020: Let the Native corporations spend some of their millions to develop this. This project is duplicated in #93020. It is not the responsibility of public money to develop this for a few villages. #93019 spends \$589,100 to set up a hatchery; why in #93020 do they want \$55,700 to study hatchery feasibility? Some towns have already started working on it.

#93022: Should not be funded if #93010 is; all this study should be combined into one project. They've had three years of study to discover what this project attempts to. They have more than enough data to take action. First thing to do is to stop the hunting.

#93024: Another unnecessary study that wastes money and time and accomplishes no action. Killing of more fry is ludicrous and wasteful. Five more years of study is overkill.

#93026: More waste of money and time. Many other studies have been done addressing this. We don't want to threaten Anchorage's water supply.

#93028: This project has been studied sufficiently and warrants immediate wetlands protection and acquisition. Why fund feasibility and inventory studies when they already know the problems and that the inventory is low (or they wouldn't be worried about it)? This project breeds more waste of money, because if the decision is made not to implement, you will have wasted \$82,000 minimum, plus the cost of unnecessary monitoring for five more years. This is all before any action is taken!

#93029: Spill money should not be used to enhance areas desegregated by logging. The logging companies should be required to do this. Pre-commercial thinning indicates more logging will be done. Why? We don't need to spend \$62,000 to survey the damage. We already know the damage.

#93030: This should be denied, since the problems were caused and known before the spill. Mismanagement caused the habitat destruction of the breeding lakes in this area, the same as in the Kenai and Southcentral areas. Putting millions of fry into lakes that have exhausted their food supply makes no sense. There are also 1/2 million fry not released in this "study". What happens to them? What a waste of life. You can increase escapement by limiting commercial fishing.

#93031: This doesn't deal with Red Lake as indicated in the project title. It creates a commercial fishery for Afognak Island where logging is heavy and the habitat damage will continue to erode the streams and lakes. Project 93032 also creates a fishing industry in this same area.

#93032: Settlement money should not be spent to change natural existing falls and grades. Anytime man starts manipulating nature, eventual disaster occurs, which leads to more manipulation of nature and more money spent. Oil is still here and will continue to inhibit fish reproduction and survival. More cleanup will not help. The evaluation part of this project has already been done and explained.

#93033: This study may involve killing more birds, which the public is strongly opposed to. Again, logging is the main culprit. In any logging areas where you want to save and increase species, you need to look at buying out the logging rights to preserve the habitat, NOT STUDY AND MONITOR FOR SEVERAL MORE YEARS. Additional study of harlequin ducks in other areas of the state is not necessary. Just apply the knowledge from other studies.

#93034: This wastes \$165,000 for more study only. Mining and logging has caused a significant decline will and continue to do so if you do not take the money for all these worthless studies and use it to buy the mining and logging areas.

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#93034: Research into guillemot colonies has been going on for 12 years. I think that's long enough for study. Action is needed now.

#93035: Again, the background on this indicates study and conclusions have already been made. More of the same is not justified. Montague Island, from everything I've heard and read, WAS heavily oiled. This project says it was not. Additional cleanup work probably won't work (since it didn't the first time around) and will only disturb the birds more, contributing to the problem. There is no restoration of any kind accomplished with this proposal, AS WITH MOST OF THE OTHER PROPOSALS THAT HAVE RESTORATION IN THEIR TITLES.

#93036: More duplicative studies. Not justified.

#93038: Since the shorelines didn't respond to cleaning the first time, why waste more money continuing it? This project proposes "light restoration duties to continue", but for how long?

#93039: Again, more studies. No enhancement or restoration. They want 1/2 Million Dollars for studies that have been done and conclusions that have been drawn. Since cleaning has been shown to be harmful, don't clean. What's the point in monitoring of long-term natural recovery? Why do objectives #2, and #3? This project is a waste of time and money.

#93042: Enough study has been done to indicate action can and should be taken now. However, the proposed action (after the unnecessary further study) is probably not realistic, since limiting fishing, tour boat operations and other human use (including subsistence hunting of whales) is something the state and Federal agencies are loath to do.

#93043: Proposes to spend \$29,100 for what we already know (according to the background and summary information). I can tell you what is limiting the recover of sea otters, so you can pay me the money: Oil and human depletion of the otters. The whole area should be protected NOW. But, you won't be able to stop the Natives, since they can kill limitlessly. Studies have been done for three years and more aren't needed. This project proposes an indefinite study time.

#93045: This is covered in other projects. Should be denied.

#93046: Settlement money should be used to study a problem that has been studied since 1984. Harbor seals should be placed on a more restrictive classification NOW, not after three more years of needless study, watching their numbers decline more. If you want to monitor something worthwhile, monitor how many are drowned in fishing nets each year and take some protective steps in that area.

11/19/92

There are a few projects that propose to actually accomplish some type of action and meet the criteria of at least part of the Memorandum of Agreement. Those are: #93016, 93025, and 93041. The rest are all just duplicative studies and research that does not, in my opinion, meet any of the criteria or intent of the terms of the settlement money. Some of these studies are proposed to go on for many, many years to discover what is already known and explained in the project.

The money should be spent now for habitat acquisition and laws to protect these areas where populations of wildlife are depleted. Money is also needed to keep field personnel there to enforce protective laws and regulations. Since many areas did not respond to cleanup, and in some areas the cleanup activities actually contributed to the depletion of some species, more of the same should not be considered.

Thank you for your time and consideration.



Carol Jensen



THE WILDERNESS SOCIETY

November 20, 1992

Exxon Valdez Oil Spill Trustee Council
645 G. Street
Anchorage, AK 99501

Re: 1993 Draft Work Plan

Dear Trustee Council:

The Wilderness Society urges the Trustee Council to take an ecosystem approach to natural resource recovery actions so it can adequately meet the terms of the Exxon Valdez settlement agreement. The ecosystems of Prince William Sound and the Gulf of Alaska were damaged by the spill, and it is common sense that the most effective restoration to "pre-spill conditions" consists of ecosystem-scale actions. Similarly, "acquiring the equivalent of natural resources injured as a result of the oil spill and the reduced or lost services provided by such resources," will most effectively be carried out on an ecosystem-wide scale.

We have reviewed many, many proposals made by the Trustee Council and the public to date, and have concluded that the overwhelming priority for the 1993 Work Plan, and for the overall Restoration Plan, must be habitat acquisition.

Restoration of fish and wildlife habitats and services (recreation, tourism, subsistence, wilderness, and others) will be best achieved by acquisition of land, timber and development rights, or conservation easements. This is the best way the Trustees can assure that the ecosystem will be protected from further damage (and to avoid actions that would slow down, compound, or reverse recovery from the spill) so that it can recover to "pre-spill conditions" and otherwise meet the terms of the settlement and other legal requirements.

We are pleased that the 1993 work plan contains project 93064 - Habitat Protection Fund. We believe this project most clearly meets the legal criteria and the public interest for using settlement funds. However, it should be funded at a "minimum of \$20 million," instead of "up to \$20 million" as given in the Work Plan so that it truly "accelerates important elements of the Habitat Protection process." This project should not be limited to "imminently threatened" parcels, but should also include all willing sellers of land or rights within the spill affected region. Furthermore, the project should include actual habitat acquisition, not just the stop-gap measures.

ALASKA REGION

430 WEST 7TH AVENUE, ANCHORAGE, AK 99501

TEL. (907) 272-9453 FAX (907) 274-4145

Habitat Protection and Acquisition should be based on Widely Accepted Ecological Concepts

Habitat protection and acquisition should generally occur on a broad scale in order to achieve settlement goals. As Trustees, you have the rare opportunity to protect still intact expanses of habitat used by a diversity of species and that support a range of services which were injured by the spill. Elsewhere, resource managers are left with crumb-sized pieces of habitat for designing nature reserves and from which to decide acquisition priorities. Here, we have the opportunity to apply our finite financial resources creatively and maximize habitat protection on an ecosystem-scale instead of simply biting off a few prime chunks.

The first step is for the state and federal agencies to recognize their role is a double one and that for their Trustee obligations to be most meaningful, they will commit on-going agency management activities to be compatible with restoration goals. For agencies to use settlement funds to augment existing management actions under the rationale that these are spill-related, and to not work toward the restoration goals in other aspects of its program, thwarts the public interest and commitments made in the settlement.

The public should not be asked to pay from one pocket (restoration funds) to study and restore populations and to protect habitat, while at the same time the government has its hand in another pocket to promote activities that would complicate management or destroy or degrade habitats in this same region -- it is the same wallet, the public's. Since public land managers should already be doing all that they can to restore the ecosystems of Prince William Sound and the Gulf of Alaska, habitat protection efforts should focus on acquisition of large blocks of intact habitat on private lands.

In the spill-affected region, we are blessed with the opportunity to do more than just protect isolated pieces such as nesting sites or streamside buffers. Acquisition of especially rich sites is important, but the integrity of these areas cannot be maintained in isolation from the adjacent habitats, nor is their value independent of the quality of the larger watershed or ecosystem. It is well known that habitat loss causes population declines and can facilitate extinction by transforming large populations into smaller, more isolated ones through the process of habitat fragmentation. *Consensus exists among biologists that, all else being equal, continuous suitable habitat supports more individuals of a species targeted for conservation than does fragmented (discontinuous) habitat* (Thomas et al. 1990).

Certain concepts of conservation strategy widely accepted by specialists in the fields of ecology and conservation biology (Den Boer 1981, Harris 1984, Thomas et al. 1990, Wilcove et al. 1986) that are applicable to Exxon Valdez restoration include:

- o "Bigger is better." Large blocks of habitat are better than small ones.
- o Blocks of contiguous habitat are better than loose aggregations of fragmented blocks due to problems associated with fragmentation and edge effects including increased predation and susceptibility to blow-down, reduced wildlife dispersal and altered movements, erosion, and others.
- o Protected habitats should be distributed across a species' complete geographic distribution.

Projects clearly related to Habitat Acquisition:

We generally support the concepts contained in projects 93059- Habitat Protection Workshop; 93060 - Accelerated Data Acquisition; and 93061 - New Data Acquisition. However, we believe that the public must play an integral part in providing expert opinions, and assessing the data needs that these projects would fill. Furthermore, we believe that the Alaska Department of Fish & Game and the Fish & Wildlife Service would be better suited as lead agencies. We believe the following, and other projects listed under wildlife restoration, will benefit the recovery process and the Trustee Council's consideration of habitat acquisition:

93051 - Habitat Protection: Stream Habitat Assessment. We strongly support the marbled murrelet nesting studies, but oppose the radio-telemetry aspect of the murrelet project because biologist experts believe it to be unnecessary (and an excessive expense). We are not opposed to the stream surveys on private lands (although this seems to be a regular agency function) but we oppose the anadromous stream channel surveys on UFSF lands because we believe that this is regular agency work.

93052 - Identification of Bald Eagle habitat (FWS). Based on our analysis of the damage assessment reports on bald eagles, we disagree with Dr. Spies about linkage to of bald eagles to the recovery planning. The summary of injury in the 1993 Work Plan gives misleading conclusions about recovery of bald eagles where it says that "surveys... suggest that the spill has not measurably affected the PWS bald eagle population." The truth is that they didn't have adequate baseline data to measure the longer term impacts. However, it is well documented that initial mortality of bald eagles was high; therefore the restoration plan can address this damage and this project seems very important.

Public Proposals Not Included

We are extremely disappointed that none of the public proposals for land/habitat acquisition were listed in the Work Plan. Many of these were proposals that would insure protection for watershed or other large habitat areas. Although we obtained the complete listing of all proposals at a Trustee Council meeting, we believe that the entire public deserves to know the full range of acquisition and other proposals that have been suggested.

It seems more important for the public to have access to adequate information in proposals than for the Work Plan to have a uniform format; i.e. we may learn more about the nature of the work if it is presented in the principal investigator's words--and especially if we can identify who will actually be doing the work. Furthermore, it should be possible for a non-agency entity (such as academic institutions) to take the lead on a project. We believe that open competition and more thorough (and well documented) peer review of restoration proposals could whittle down the costs and improve the quality.

The Anchorage Daily News carried a story about possible requests to use restoration funds for logging of spruce bark beetle killed timber; we strongly oppose this idea if any of the agencies should bring it to the Council.

Inflated Administrative and Management Costs

We are pleased that the Work Plan dropped the \$10 million cellular phone system proposed by the U.S. Forest Service. However, that project was indicative of many attempts by the Forest Service and other agencies to use spill funds as a "wish list" for fulfilling their on-going management responsibilities. By dropping the headings of restoration monitoring, manipulation/enhancement, management actions, and habitat protection/acquisition, the plan hides how much of the money will be used to bolster the agencies' regular management actions. It would be helpful for the agencies to explain how the spill funds will augment or replace existing programs. For example, we understand that fertilization of Coghill Lake was done last summer as part of an existing agency program, but is now being proposed in the Work Plan.

The administrative costs are clearly excessive. More than \$5.7 million is proposed for administrative costs in the Restoration Team's proposal. There is the obvious budget for administration -- \$4.6 million -- plus over \$1.1 million "general administration" costs hidden within the individual project descriptions. Thus, 32% of this year's budget for specific projects (totalling \$17.8 million) is going for administration. (It is perplexing that unlike all other proposed projects, the habitat acquisition project does not show associated administrative costs and therefore we believe comparison of the total administrative costs with the rest of the projects is fitting). The rationale for using

existing agencies to carry out much of the research and restoration was to minimize administrative costs by not creating a new bureaucracy; clearly this goal has not been achieved.

We oppose these projects:

93009 - Public information, education, and interpretation. This USFS project includes funding a Public Affairs Specialist, making a "family of brochures," and a "family of videos." These are clearly regular functions of visitor interpretation for which the agency should use its regular funds. The Forest Service already has an oil spill brochure. Based on the proposals in the Work Plan which are heavily weighted toward habitat manipulation instead of habitat protection, we doubt that the Forest Service is in the best position to provide an "accurate/balance view" of existing conditions in PWS.

93025 - Montague Is. Chum Salmon restoration. The USFS should take steps to protect existing high quality salmon and other anadromous stream habitats at risk from logging and road construction on Montague Island instead of requesting money for such an enhancement. This will contribute far more over the long-run.

93028 - Restoration of wetlands. This USFS project is a misleading waste of money. There is much that could be done to protect or restore wetlands in the spill affected region, but this project instead consists of an ill-conceived habitat manipulation with a dubious outcome. The USFS proposes wetlands "restoration" on Montague Island to undo nature's wrath from the 1964 earthquake. **THE FOREST SERVICE SHOULD JUST LEAVE MONTAGUE ISLAND ALONE.** On the one hand, USFS claims benefits to waterfowl, furbearers (mink -introduced species) and anadromous fish in San Juan drainage. Yet the USFS admits on the other hand that it doesn't really know what is there, since most of this project is to inventory existing habitat; therefore it can't claim that the habitat manipulations would be an overall improvement. The inventories are an integral part of USFS responsibilities described in the Chugach Forest Management Plan. Since the USFS has already permitted road construction across sensitive habitats in the vicinity of this proposed project, these inventories should have already been done.

Furthermore, grass and forest fringe habitats are among those that support the Montague Island Tundra vole, a Candidate species for listing under the Endangered Species Act. The proposed flooding of the sedge/grass and forest edge habitats alter important habitat for the voles. This needs to be addressed prior to any further consideration of this project. Ironically, the Forest Service claims to be implementing restoration option that would "protect or acquire upland forest and watershed." **BUY HABITAT ON MONTAGUE INSTEAD.**

93029 - Prince William Sound Second Growth Management. The USFS proposes pre-commercial thinning on 1970's clearcuts. The basis for this action is that "by accelerating the return to old-growth vegetative conditions. . . habitat for old-growth dependent

species such as river otter, marbled murrelet, harlequin duck and bald eagle can be therefore be improved." WHAT GARBAGE! If any management is appropriate for 20-year old clearcuts, it should be done using the USFS regular budgets. Furthermore, the inventories that are described are regular agency functions that apparently it has been neglecting. Within our lifetimes, there is no management that will provide old-growth habitats, except protecting those that still exist today; ACQUISITION OF EXISTING OLD-GROWTH HABITATS WILL MEET RESTORATION GOALS.

93050 - Update Information on Sources Relevant to EVOS affected resources. The goal of DNR project is muddled. If this is a proposal concerning operation of the oil spill library or the February symposium it should be rewritten and reconsidered. As written, this project should be funded (if at all) by DNR's regular budget.

Excessive emphasis on commercial fishery projects

Although the restoration plan should include actions to restore the range of natural resources and services injured by the spill, we believe that the work plans have been excessively focused on commercial fishery projects. Instead, the work plans should focus on recovery of wild stocks. The 1993 Work Plan includes over \$8.6 million in management actions and studies for pink, chum and sockeye salmon for which spill-related injury is not documented. The chief scientists found that for 11 of 15 projects related to commercial fish there was no linkage with spill injury. While some projects to compensate for lost services may be appropriate, most of these projects are clearly on-going, regular management responsibilities of ADF&G. ADF&G has proposed over \$5.4 million for Kenai River management actions alone. Because linkage with spill affects is still uncertain, we believe that ADF&G should take responsibility for its own poor past management practices.

Ironically, despite the recognition of injury for herring given in the Work Plan, there is not a project that will evaluate on-going herring injury. Such a project is time-critical and of much higher priority than many of the manipulation/enhancement projects that the restoration team has proposed.

We oppose:

93012 - Genetic stock ID Kenai River Sockeye (Upper Cook Inlet mixed stock; regular agency management).

93024 - Coghill Lake Sockeye Stock restoration (on-going agency project)

93030 - Red Lake Restoration (based on expectation of injury not yet seen-inappropriate.)

93031 - Red Lake Mitigation (mitigation for predicted injury; concern about ecological effects of raising sockeye smolts in pens and hatchery derived stock interactions with wild fish).

- 93063 - Anadromous Stream surveys (ADF&G, pink & chum salmon, regular agency function.)
- 93014 - Coded wire tag study (ADF&G, pink & chum; Restoration team opposed)
- 93026 - Fort Richardson Hatchery Water Pipeline. (This is an expensive boondoggle).

Wildlife Restoration (and Long-term Ecosystem Monitoring)

Long-term recovery monitoring should comprehensively approach the entire ecosystem and be able to provide adequate information about recovery (and continuing injury) to satisfy the ten-year rejoinder clause in the settlement. We support an integrated approach and one that adequately covers birds, marine mammals, invertebrates, inter and subtidal habitats, other "non-game" species, National Park resources, and wilderness values in addition to fish. However, we believe that the agencies need to better distinguish these projects from their regular management actions.

We believe these projects fit the criteria of necessary long-term recovery monitoring and so should be supported:

- 93034 - Pigeon Guillemot Recovery. (FWS. Strong support because this injured species has been neglected and the information relates to upland habitat acquisition.
- 93035 - Black oystercatchers/ Oiled mussel beds. (FWS. One of the few looking at on-going food chain effects.)
- 93036 - Oiled mussel beds (NOAA)
- 93041 - Comprehensive Monitoring. (NOAA. Support so long as the goal is to better integrate the long-term recovery monitoring among agencies).
- 93042 - Killer whale monitoring. (NOAA. Support because we believe that the information about initial injury justifies gathering long-term information about population recovery).
- 93045 - Marine Bird/Sea Otter surveys. (FWS. We are highly supportive of the comprehensive boat surveys for birds. For sea otters, consideration of aerial surveys which may be more accurate should be given.)
- 93047 - Subtidal monitoring (NOAA).

These following projects seem to fit into the long-term recovery monitoring goal but need better justification to distinguish them from on-going agency management actions:

- 93043 - Sea otter demographics and Habitat. (FWS).
- 93046 - Harbor seal monitoring. (FWS.)
- 93033 - Harlequin Duck restoration. (ADF&G). Although we do not believe that individual nest-site locations need to be identified for each parcel of land that may be considered for acquisition, we are generally supportive of the goals of this project to improve characterization of harlequin duck habitat use and continuing injury.

We have serious concerns about these projects:

93038 - Shoreline Assessment. While we believe it is useful to know where there is still existing surface and subsurface oil, such determinations should be an integral part of long-term systematic ecological monitoring (which this does not seem to be). Therefore, we oppose this project because we doubt that future cleanup of such oil will provide meaningfully to recovery. It may be more useful to take such looks for oil a few years from now.

93039 - Herring Bay Experimental and Monitoring Studies. Nearly all of this ADF&G project seems to be a contract that DNR will execute to generate new data on PWS beach slope and aspect and compute total area with damaged Fucus (intertidal) communities. How this relates to recovery is very unclear in the proposal, and it appears to be an excuse to do the bathymetry-- a DNR responsibility that should use regular agency funds.

We strongly oppose:

93022 - Murre Decoy. Even though U.S. Fish & Wildlife is the lead agency, their biologists are not supportive of this project and an independent peer reviewer, D. Roby, had many concerns about its technical feasibility of the project. He said, "it should be emphasized that this restoration option cannot be practically employed on a sufficiently large scale to produce substantial increases at all or even most of the spill-affected murre colonies;" i.e. this is a total experiment with very low chances of success. However, the murre colony monitoring is very important and should be funded. If the Trustees insist on active intervention in management, we prefer project #93010 - Reduce disturbance near murre colonies.

Archeology

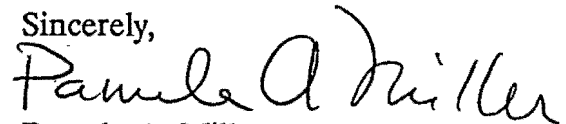
Although we generally believe the archeology projects are beneficial, we believe approval of these projects should be considered in light of the entire Restoration Plan. We have these specific comments:

93007 - Archeological Site Stewardship Program. (ADNR). We strongly oppose DNR being the lead agency; they will have to hire a new coordinator for the project anyway. The land management agency with the most sites should be chosen. Native organizations should be lead or at least cooperating agencies.

93005 - Cultural Resource Information, education and interpretation. (USFS mostly). Although the idea looks good we strongly oppose the personnel and method of this; Native organizations would more appropriately be lead agency if this is funded at all.

The Wilderness Society appreciates this opportunity to provide these comments on behalf of our 310,000 members nationally, of whom about 1,400 reside in Alaska. The Wilderness Society has had a longstanding interest in the protection of the natural values and integrity of Alaska's parks, refuges, forests, and other public lands, rivers, and shorelines. We look forward to continued involvement in the restoration planning process.

Sincerely,



Pamela A. Miller
Asst. Regional Director

References

Anchorage Daily News. 11 November 1992. "State proposes Logging Kenai's Infested Timber": C-1.

Den Boer, P.J. 1981. On the survival of populations in a heterogeneous and variable environment. *Oecologia* 50: 39-53.

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Wilcove, D.S., C.H. McLennan, and A.P. Dobson. 1986. Habitat fragmentation in the temperate zone. pp. 237-256 in: M. Soule and B.A. Wilcox, eds. *Conservation Biology: The science of scarcity and diversity*. Sunderland, MA: Sinauer Associates.

93328161



"The mission of the Council is to ensure the safe operation of the oil terminals, tankers, and facilities in Cook Inlet so that environmental impacts associated with the oil industry are minimized."

November 20, 1992

Exxon Valdez Trustee Council
645 "G" Street
Anchorage, Alaska 99501

Re: Exxon Valdez Draft 1993 Work Plan

The Cook Inlet Regional Citizens' Advisory Council is pleased to provide comment on the Exxon Valdez Draft 1993 Work Plan. Over the past six months Council staff has closely followed the development of this Plan.

Cook Inlet RCAC was formed under Section 5002 of the *Oil Pollution Act of 1990* (OPA90). The Council's mission is to ensure the safe operation of the oil terminals, tankers, and facilities in Cook Inlet so that environmental impacts associated with the oil industry are minimized. The organization's membership consists of representatives of communities throughout the Cook Inlet region, and specific interest groups as mandated by OPA'90.

At Cook Inlet RCAC's November 7, 1992 meeting, the Council recommended the Trustee's first priority should be to fund pollution monitoring programs for the entire Exxon Valdez spill-affected area, including Cook Inlet. The "Comprehensive Restoration Monitoring Program" (project number 93041) described in the Draft Work Plan addresses only areas in Prince William Sound and the Gulf of Alaska. Resources and services in Cook Inlet have been, and will continue to be, impacted by the Exxon Valdez Oil Spill.

Furthermore, it is the sentiment of Cook Inlet RCAC that:

- a monitoring program is time critical and should begin as soon as possible so a baseline of hydrocarbon contamination can be established for comparison in future years;
- implementation of environmental monitoring in Cook Inlet could aid in allaying public concerns regarding suspected chronic impacts of the Exxon Valdez Oil Spill;
- environmental monitoring, conducted through Cook Inlet RCAC, could begin in 1993; and

Cook Inlet Regional Citizens Advisory Council

11355 Frontage Rd. • Suite 228 • Kenai, Alaska 99611 • (907) 283-7222 • FAX (907) 283-6102

**Exxon Valdez Trustee Council
Draft 1993 Work Plan
November 20, 1992
Page Two**

•monitoring, conducted through Cook Inlet RCAC, would be free from the delay and other confines of those conducted through government agencies.

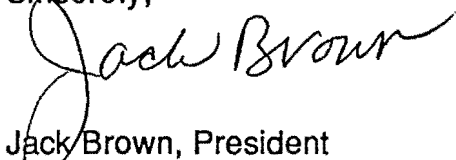
The Environmental Monitoring Committee of Cook Inlet RCAC has spent in excess of \$50,000 to develop such a program and previously requested the Trustee Council assist in implementation of the program.

In addition, it is Cook Inlet RCAC's stated position, the Trustee Council should prioritize expenditures toward spill prevention measures that are not being addressed in Cook Inlet and elsewhere in Alaska but are already in place in Prince William Sound. Items that are worthy of support include pre-positioning of response equipment, vessel escort in Cook Inlet, and research toward the effects of various spill response technologies.

We are sympathetic to the difficult task the Trustee Council has in balancing the many competing interests in allocating the settlement monies. As it stands, however, Cook Inlet RCAC is not in concurrence with the priorities established in the 1993 Draft Work Plan, nor its emphasis on studies to be conducted by its member agencies.

Once again, thank you for the opportunity to comment on the 1993 Draft Work Plan. Cook Inlet RCAC is available to assist the Trustee Council in any way possible in helping attain its established goals and objectives. If you have any questions, please feel free to contact either Lisa Parker, Executive Director, or Jim Dey, Program Coordinator for Environmental Monitoring at 283-7222.

Sincerely,



Jack Brown, President
Cook Inlet RCAC

cc: Cook Inlet RCAC Board of Directors
Charter Funding Companies
Environmental Monitoring Committee
Senator Frank Murkowski, U. S. Senate
Congressman Don Young, U. S. House of Representatives
Congressman George Miller, U. S. House of Representatives

COMMENTS

93328162

You are invited to share your ideas and comments with the Trustees.

Please use this tear sheet to present your views on the 1993 Draft Work Plan.

You may send additional comments by letter regarding the 1993 Draft Work Plan.

It is my opinion that the board should in fact limit restoration actions to those projects that are time critical. I am in agreement with Craig Matkins' prioritization of projects.

I would like to single out project # 93064. In view of the numbers of properties that must be involved the dollar amount allotted seems grossly low.

The parcel that is most important to me is the SNA property in Kachemah Bay - the buyback of this land to enhance and enlarge the State Park is critical in my estimation. This land is under the eminent threat of being logged by Timber Trading Company in the very near ~~future~~ future and desperately needs to be saved.

If needed, use the space on the back or attach additional sheets. Please fold, staple, and add a postage stamp. Thank you for your interest and participation.

Additional Comments:

02

------(fold here)-----Return Address:

Chris Mone
Box 956
Nome, AK 99603



Exxon Valdez Oil Spill Trustee Council
645 G Street
Anchorage, AK 99501

Attn: 1993 Draft Work Plan

COMMENTS

You are invited to share your ideas and comments with the Trustees.

Please use this tear sheet to present your views on the 1993 Draft Work Plan.

You may send additional comments by letter regarding the 1993 Draft Work Plan.

I was in attendance at the Trustees Council meeting in Sept. 92, and the public comments on support of habitat protection & acquisition were amazing. I was one who spoke then on the importance of it, & I was happy to find other "peers" on my issue. I still feel that this issue is critical and project 93064 is crucial. I don't, however, feel like there is enough money appropriated for habitat protection, and I urge the Trustees Council to act on this concern.

The land within Kachemak Bay State Park is ideal; it is easily accessible to the public, it has lots of educational properties for the many school children who visit & study there each year, and it is also an important habitat for injured species. My organization brings over 100 youngsters to Kachemak Bay each summer, and they are totally awed by the eagles & others, and the variety of other species that are unknown here in Anchorage.

I also urge the Trustees to re-examine these projects. The costs of many are unreal; why not submit them out for bids to lower the cost, and to see the

If needed, use the space on the back or attach additional sheets. Please

fold, staple, and add a postage stamp. Thank you for your interest and participation.

finances stay in local communities? I also see some projects are being completely silly - for example - projects 93009, and 93026. Dr. Spies seems to be unsure of these projects also with his "S" rating.

Additional Comments:

I Thank you for the opportunity to continue to share our concerns, and I hope that you will continue to allow us to share these with you.

Sincerely,

Sue Post

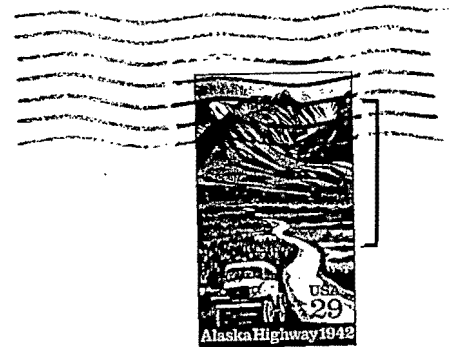
Environmental Education Director
Alaska Center for the Environment

------(fold here)-----Return Address:

Sue Post

7343 Linden Dr

Anch, AK 99502



Exxon Valdez Oil Spill Trustee Council
645 G Street
Anchorage, AK 99501

Attn: 1993 Draft Work Plan

COMMENTS

You are invited to share your ideas and comments with the Trustees.
Please use this tear sheet to present your views on the 1993 Draft Work Plan.
You may send additional comments by letter regarding the 1993 Draft Work Plan.

KACHEMAK BAY STATE PARK IS IN DANGER
OF BEING PUT ASUNDER BY LARGE
PRIVATE INHOLDERS (I.E. TIMBER TRADING CO.,
SELDOVIA NATIVE ASSOC., AND COOK INLET REGION/NK

The Trustee Council can prevent this
from happening by enough money in their
habitat protection fund (project # 93064)

A minimum of \$22 million is needed
just for the Kachemak Bay State Park
portion, since that is the previous
agree-upon amount for purchase of
those inholdings.

I urge you to give the absolute

If needed, use the space on the back or attach additional sheets. Please
fold, staple, and add a postage stamp. Thank you for your interest and participation.

highest priority to the habitat protection
fund and include enough so that (over)

(Contd)

Additional Comments:

Kachemak Bay State Park can be fully funded, along with other critical areas that are under imminent threat.

Other areas that were not affected by the oil spill, like fish hatcheries in Anchorage should not be funded with Trustee Council money.

Thank you, Mike Coumbe

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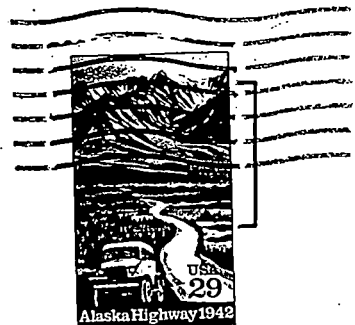
Return Address:

MIKE COUMBE

510 M STREET

ANCHORAGE, ALASKA

99501



Exxon Valdez Oil Spill Trustee Council
645 G Street
Anchorage, AK 99501

Attn: 1993 Draft Work Plan

1. I believe that the Trustee Council should fund some time critical projects and those that would be a lost opportunity that receive overwhelming public support, also fund some limited restoration projects that are not time-critical that likewise receive overwhelming public support, but not implement a large-scale restoration program prior to the completion of the Restoration Plan, with the exception of habitat protection, which should be initiated at once.

2. Much more money is needed for project 93064, the Habitat Protection Fund. As stated in the 1993 Draft Work Plan, public comment has overwhelmingly supported use of the Habitat Protection and Acquisition option as a method of preventing further harm to, and assisting the recovery of, natural resources and services injured by the Exxon Valdez oil spill. Please listen to the public and urge the Trustees Council to move fast and begin immediate discussions with private land, timber, and subsurface owners throughout the EVOS region.

3. Seldovia Native Association (SNA), Timber Trading Company (TTC), and Cook Inlet Region, Inc.'s(CIRI) inholdings within Kachemak Bay State Park should be acquired in their entirety because the land within Kachemak Bay State Park is highly qualified to serve as replacement for lost recreation and wilderness services, also as ideal habitat for injured species.

4. The criteria for habitat acquisition should not be limited to habitat under imminent threat because obtaining logging permits, for example, is an expensive procedure, and the subsequent cost to the EVOS Trustees Council will likely be higher, also land with timber already permitted for logging may no longer be for sale. Rather, the criteria should include special opportunities (such as was available last year when TTC, SNA, and CIRI came together in an agreement), and should be as liberal as possible.

5. The cost of other projects should be reduced. This can be achieved in several ways. Agencies could do many of the projects funded in part from their on-going budgets and not dip into the EVOS Civil Penalty money as the sole source of funding. Whenever possible, costs could be reduced by putting out to competitive bid the services needed to complete projects.

Some projects could be eliminated, for example the ones that were not recommended by the Chief Scientist. Some that he did not rate highly with which I agree are numbers 93009 (duplicates in work already done by other entities such as Pratt Museum in Homer) 930026 (a very expensive project with rather remote connection to the oil spill), and 93029 (it makes far more sense to save old growth forest now). Others could be partially funded, such as Project 93051, in which the murrelet project seems to have more value than the anadromous stream portion, which information should already be available from other sources such as ADF&G catalogue of anadromous streams.

6. In the future, the public should have longer than 30 days to comment on draft work plans.

By: Anne Wieland, 1421 N St., Anchorage, AK 99501 (907) 276-5477
Nov. 20, 1992

COMMENTS

You are invited to share your ideas and comments with the Trustees.
Please use this tear sheet to present your views on the 1993 Draft Work Plan.
You may send additional comments by letter regarding the 1993 Draft Work Plan.

My comments are attached to this
sheet.

Anne Wieland
1421 N St
Anchorage, AK 99501
(907) 276-5477

If needed, use the space on the back or attach additional sheets. Please
fold, staple, and add a postage stamp. Thank you for your interest and participation.

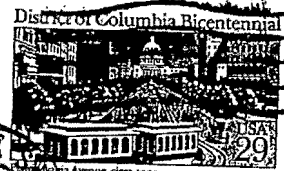
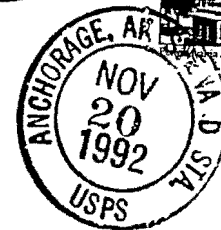
Additional Comments:

----- (fold here) ----- Return Address

Anne Wieland

1421 N St

Anchorage, AK 99501



Exxon Valdez Oil Spill Trustee Council
645 G Street
Anchorage, AK 99501

Attn: 1993 Draft Work Plan

COMMENTS

You are invited to share your ideas and comments with the Trustees.
Please use this tear sheet to present your views on the 1993 Draft Work Plan.
You may send additional comments by letter regarding the 1993 Draft Work Plan.

Dear Trustees:

I feel that more money is needed for project #93064, the Habitat Protection Fund.

The Seldovia Native Association, Timber Trading Company, and Cook Inlet Region Inc.'s inholdings within Kachemak Bay State Park should be acquired because the land within the park is highly qualified to serve as a pristine, unspoiled, habitat area.

In the area of Peterson Bay, where I have a cabin, I have watched a couple of families of Sea Otters rearing their young. One of the otters is obviously the Elder Statesman as his beard is old and gray. He has established residency on my Floating boat dock.

Winter King Salmon can be seen feeding in Peterson Bay where large rafts of logs are slated for storage prior to shipment.

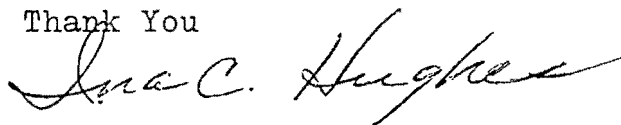
The Bald Eagle population has grown to the extent that the local tour boats bring tourists into Peterson Bay to observe the many Eagles nesting.

The area of Peterson Bay is a habitat of the Murrelet, which was heavily impacted with the oil spill.

Other bird residents of the area are Mergansers, Kittiwakes, Cormorants, Harlequin, and the list goes on.

Please listen to the public and urge the Trustees Council to move fast and begin immediate negotiations with private land, timber, and subsurface owners.

Thank You

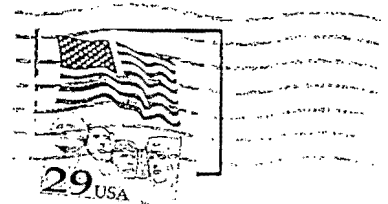


If needed, use the space on the back or attach additional sheets. Please fold, staple, and add a postage stamp. Thank you for your interest and participation.

Additional Comments:

----- (fold here) ----- Return Address:

Tina Hughes
PO Box 110693
Anch AK 99511



Exxon Valdez Oil Spill Trustee Council
645 G Street
Anchorage, AK 99501

Attn: 1993 Draft Work Plan

COMMENTS

93328/67

You are invited to share your ideas and comments with the Trustees.
Please use this tear sheet to present your views on the 1993 Draft Work Plan.
You may send additional comments by letter regarding the 1993 Draft Work Plan.

This book with its multitude of projects is overwhelming. My first impressions on the negative side are that many are attempts by organizations to fund projects which otherwise might not get funded. An example of this is #93020 - does this really qualify for these funds? Others leaning toward study rather than doing are questionable. Perhaps funding of some projects could be reduced to allow greater funding for more essential projects. The project which would seem the most crucial is number 93064 since it would provide protection of the most significant lands which could be permanently lost and irreplaceable damage done. There is vast public support for this or something of its nature. Funding for this should probably be increased,

SALLY B. TARR

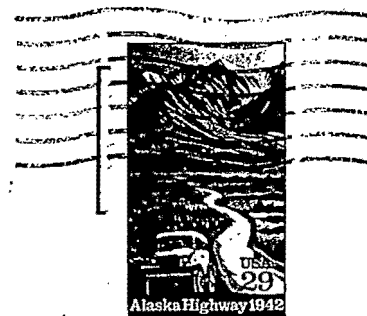
If needed, use the space on the back or attach additional sheets. Please fold, staple, and add a postage stamp. Thank you for your interest and participation.

Additional Comments:

67

------(fold here)-----Return Address:

SALLY BURKHOLDER
7951 JODHPUR ST.
ANCHORAGE, ALASKA 99502



Exxon Valdez Oil Spill Trustee Council
645 G Street
Anchorage, AK 99501

Attn: 1993 Draft Work Plan

COMMENTS

93328168

You are invited to share your ideas and comments with the Trustees.
Please use this tear sheet to present your views on the 1993 Draft Work Plan.
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The most important project within this work plan is probably 93064. For the past few years there has been overwhelming public support during the legislative process for funding to support such a concept. Perhaps this is a better way to support a goal which is publically desirable rather than through the legislative process. I think it needs even greater funding.

There are some projects in this book that seem to be misplaced. Do we really want to build a water pipeline #93026 with these funds? Can we afford the time to look for marbled nests? Perhaps some projects funding could be reduced to enhance other more essential then we could accomplish a few goals rather than partially accomplish many

If needed, use the space on the back or attach additional sheets. Please fold, staple, and add a postage stamp. Thank you for your interest and participation.

Jim Burkholder

Additional Comments:

----- (fold here) -----

7951 Jodhpur St.
Anchorage, Ak.
99507

Return Address



Exxon Valdez Oil Spill Trustee Council
645 G Street
Anchorage, AK 99501

Attn: 1993 Draft Work Plan

93328169

COMMENTS

You are invited to share your ideas and comments with the Trustees.
Please use this tear sheet to present your views on the 1993 Draft Work Plan.
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I AM IN TOTAL SUPPORT OF PROJECT
93064 DUE TO THE OVERWHELMING
STATWIDE SUPPORT IT HAS RECEIVED IN
THE PAST. I'M SURE IT WILL NEED MORE
FUNDS THAN YOU HAVE PLANNED. DO WE
REALLY WANT TO FUND A PROJECT #93029
ON SECOND GROWTH MANAGEMENT? PERHAPS
THE ARE OTHERS WHOSE FUNDING COULD
BE SHIFTED TO MORE IMPORTANT PROJECTS

JEFF GRAVES

If needed, use the space on the back or attach additional sheets. Please
fold, staple, and add a postage stamp. Thank you for your interest and participation.

Additional Comments:

----- (fold here) ----- Return Address

7951 JODHPUR ST.
ANCHORAGE, AK. 99502



Exxon Valdez Oil Spill Trustee Council
645 G Street
Anchorage, AK 99501

Attn: 1993 Draft Work Plan

COMMENTS

You are invited to share your ideas and comments with the Trustees.
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Dear Trustees,

I am grateful to you for the hard work and time you have put into this draft.

Looking over these projects I see that the funding is generous and I feel excessive on several. I feel that some projects could be put out to competitive bid and save the trust funds. I make this argument because having lived in Alaska for twenty years I have seen how public funds have been spent unresponsively and we do not need to repeat history. The state and the people deserve to have these funds spent wisely.

I hope that research projects are not over lapping or being duplicated. I would like to be more specific on this but time limits my response.

Being a long time Alaskan I see lands that are imperiled by mans gross misuse. I feel that more funds should be made available for Habitat Protection and Acquisition. We need to have the foresight, for generations to come, to protect important public lands and acquire private lands for habitat protection. I especially would like Kachemak Bay State Park in holdings to receive a lot of attention for habitat acquisition. The park

If needed, use the space on the back or attach additional sheets. Please fold, staple, and add a postage stamp. Thank you for your interest and participation.

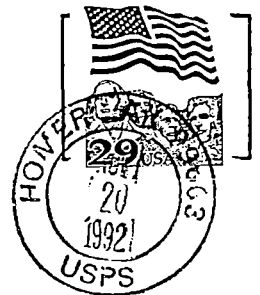
was impacted by the oil spill and is one of two state park areas merked for funds. This park will be important for generations to come so I hope that you will make funds available to help with the long back.

Additional Comments:

Several projects deal with enhancing bird populations (93C22)
It is a known fact that lots of island bird habitat are
in danger from introduced predators. These are mainly Foxes
introduced by Russians & Americans for fur. Work is ongoing
by Fish & Wildlife Service to eradicate these animals and
enhance bird populations. This project would warrant
funds I feel because it has large implications of
improving bird habitat

------(fold here)-----Return Address:

Robert Archibald
PO Box 2460
Homer, AK 99603



Exxon Valdez Oil Spill Trustee Council
645 G Street
Anchorage, AK 99501

Attn: 1993 Draft Work Plan

COMMENTS

You are invited to share your ideas and comments with the Trustees.

Please use this tear sheet to present your views on the 1993 Draft Work Plan.

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I would like to see most of the funds spent on resource + habitat acquisition. I think this is the highest + best use of these dollars. The rest of the \$ could then be split between phys restoration + scientific studies.

These \$ need to be managed responsibly - there is such a danger of too much of the funds going into agencies + this must be watched closely. With that in mind I would like to suggest that as much work as possible be contracted out to the private sector, rather than have the agencies do it. It would be cheaper + more fair. So please put as many of these projects as possible out to bid + have the agencies use their own budgets for their prospective projects.

I am against the murie project which is going to use decoys + dummy eggs. I think this \$80,000 could be better spent on fox eradication in the Maritime Refuges on the A.K. Peninsula + Aleutians.

I would also like to see some of these funds used for the Kachemak Bay State

If needed, use the space on the back or attach additional sheets. Please fold, staple, and add a postage stamp. Thank you for your interest and participation.

Park buyback. The outer coasts of the Kach. Bay Wilderness Park (both parks are included in the same system) was heavily

Additional Comments:

impacted by the oil spill. I think
this would be gain & wise use of the
funds, since these lands are threatened
with clear cut logging activity.

please, please use these \$ responsibly
I think your conscience can be your
best guides to what projects truly deserve
funding.

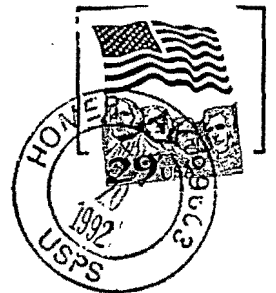
Thank you

Robert Highland

----- (fold here) -----

Return Address:

Robert Highland
P.O. Box 2460
Homer, AK 99603



Exxon Valdez Oil Spill Trustee Council
645 G Street
Anchorage, AK 99501

Attn: 1993 Draft Work Plan

COMMENTS

You are invited to share your ideas and comments with the Trustees.

Please use this tear sheet to present your views on the 1993 Draft Work Plan.

You may send additional comments by letter regarding the 1993 Draft Work Plan.

To EXXON TRUSTEES:

Please consider the immediacy of the clear cutting threat to so much of the oiled shoreline. I do not feel that the Draft Plan adequately address the issue of habitat acquisition. Less should be spent on continued studies and more on saving the watershed. From Kaskapau to Merrimack, river otter to Dolly Varden, seals & salmon; all need a healthy watershed. The Forestry Practice Act as we all know is a hollow shell which barely conceals the open door to forest & habitat destruction which it allows.

I have carefully read Craig Morris's in depth review of the document. As a capable reviewer, I ask you to give his comments heavy weight. He is clear, well informed and has a solid holistic approach to making the best of this ongoing challenge.

After 25 years of living year round in & on the coast, traveling all over Alaska & having seen many of the world's comparable coastal resources, I hope you

If needed, use the space on the back or attach additional sheets. Please

fold, staple, and add a postage stamp. Thank you for your interest and participation.

will consider seriously my careful advice. Habitat acquisition & protection is very important, to us, the people

Additional Comments: *most damaged by EVOS. Thank you for your consideration. Finally, please consider most seriously carefully the people of the EVOS damaged shoreline and their opinions.*

Thank you —

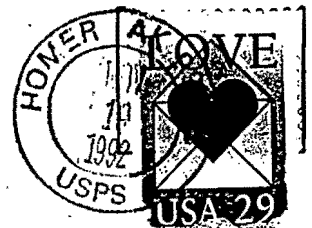
*Diane
McBride*

----- (fold here) ----- Return Address:

Diane McBride

Po 956

Homer, Ak. 99603



Exxon Valdez Oil Spill Trustee Council
645 G Street
Anchorage, AK 99501

Attn: 1993 Draft Work Plan

COMMENTS

You are invited to share your ideas and comments with the Trustees.
Please use this tear sheet to present your views on the 1993 Draft Work Plan.
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Of the many projects presented in the EVOS 1993 Draft Work Plan I would like to comment on project 93064 The Habitat Protection Fund. Public comment has overwhelmingly supported the use of the Habitat Protection and Acquisition option as a method of preventing further harm to, and assisting in the recovery of natural resources and services injured by the Exxon Valdez oil spill. More funds will be needed than are requested for project 93064. To meet the needs that have been expressed by the public, the Trustees Council must proceed with a sense of urgency to begin immediate negotiations with private land, timber, and subsurface owners to acquire these priceless habitats.

The Seldovia Native Association, Timber Trading Company, and Cook Inlet Region, Inc.'s have expressed a willingness to sell their inholdings within Kachemak Bay State Park. These inholdings should be acquired because the land within Kachemak State Park is highly qualified to be used as replacement for lost recreation services, also as needed habitat for injured and endangered species. At least 22 million dollars should be set aside for this purpose.

Acquisition of this critical habitat should begin immediately because of the imminent threat of logging in this area. The above companies are already in the process of acquiring permits to begin their logging operations. Once the permits are granted the costs of acquisition will be much higher for the EVOS Trustees Council, and the timber may not be for sale.

For the above reasons I would request that the EVOS Trustees Council approve project 93064 with added funds, and begin as soon as possible in the Acquisition of the in holdings in Kachemak Bay State Park.

Yours Truly,

Robert G. Hartley

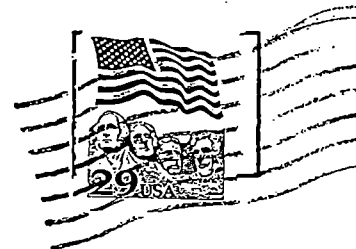
If needed, use the space on the back or attach additional sheets. Please fold, staple, and add a postage stamp. Thank you for your interest and participation.

Additional Comments:

33

----- (fold here) ----- Return Address:

Robert G. Hartley
6712 Cathy Sarkis St.
Anchorage, Ak 99502



Exxon Valdez Oil Spill Trustee Council
645 G Street
Anchorage, AK 99501

Attn: 1993 Draft Work Plan

COMMENTS

93328174

You are invited to share your ideas and comments with the Trustees.
Please use this tear sheet to present your views on the 1993 Draft Work Plan.
You may send additional comments by letter regarding the 1993 Draft Work Plan.

Dear Trustees:

I feel that more money is needed for project #93064, the Habitat Protection Fund.

The Seldovia Native Association, Timber Trading Company, and Cook Inlet Region Inc.'s inholdings within Kachemak Bay State Park should be acquired because the land within the park is highly qualified to serve as a pristine, unspoiled, habitat area.

In the area of Peterson Bay, where I have a cabin, I have watched a couple of families of Sea Otters rearing their young. One of the otters is obviously the Elder Statesman as his beard is old and gray. He has established residency on my floating boat dock.

Winter King Salmon can be seen feeding in Peterson Bay where large rafts of logs are slated for storage prior to shipment.

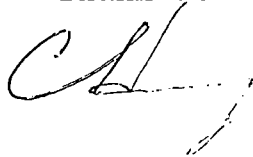
The Bald Eagle population has grown to the extent that the local tour boats bring tourists into Peterson Bay to observe the many Eagles nesting.

The area of Peterson Bay is a habitat of the Murrelet, which was heavily impacted with the oil spill.

Other bird residents of the area are Mergansers, Kittiwakes, Cormorants, Harlequin, and the list goes on.

Please listen to the public and urge the Trustees Council to move fast and begin immediate negotiations with private land, timber, and subsurface owners.

Thank You



If needed, use the space on the back or attach additional sheets. Please fold, staple, and add a postage stamp. Thank you for your interest and participation.

Additional Comments:

03

ANCHORAGE

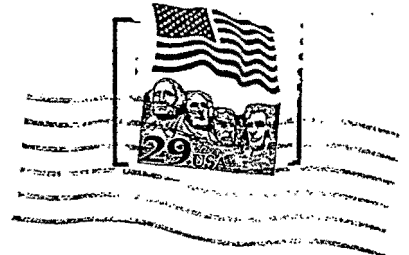
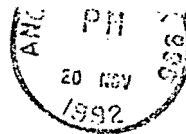
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Return Address:

Chuck Hughes

PO Box 110693

Anch. AK 99511



Exxon Valdez Oil Spill Trustee Council
645 G Street
Anchorage, AK 99501

Attn: 1993 Draft Work Plan

COMMENTS

93328175

You are invited to share your ideas and comments with the Trustees.

Please use this tear sheet to present your views on the 1993 Draft Work Plan.

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of all the projects, I believe that project
93064 will accomplish the most, and
that more money should be directed to
habitat acquisition.

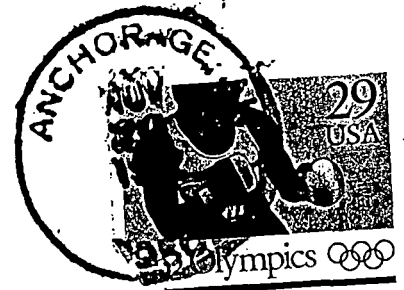


If needed, use the space on the back or attach additional sheets. Please fold, staple, and add a postage stamp. Thank you for your interest and participation.

Additional Comments:

------(fold here)-----Return Address:

Janice Schofield
39445 Blueberry Ct
Homer Alaska 99603



Exxon Valdez Oil Spill Trustee Council
645 G Street
Anchorage, AK 99501

Attn: 1993 Draft Work Plan

DAMAGED IN HANDLING
IN THE POSTAL SERVICE

COMMENTS

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- A. 93064 - More money needed for Habitat Protection Fund. The public wants habitat protection and land acquisition to move forward. B. Please hear the continued public outcry, move quickly, and begin discussions w/ private land, timber and other owners. C. Inholdings within Kachemak Bay State Park need to be acquired. It qualifies by the highest standards for recreation, wild-life habitat as well as other tourism uses. D. Logging is totally inappropriate in areas near K-Bay State Park. Three families in Peterson Bay (near Halibut Cove) have shellfish grower's permits pending w/ the State of Alaska. I don't believe logging would be compatible w/ any of the existing shellfish farms in Kachemak Bay. Please assist this NEW INDUSTRY (shellfish farming) get a great start in Kachemak Bay. E. Allocate at least \$25 M for the K-Bay land acquisition from this funding base and the people will love you for it.

If needed, use the space on the back or attach additional sheets. Please fold, staple, and add a postage stamp. Thank you for your interest and participation.

9328177

COMMENTS

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Please use this tear sheet to present your views on the 1993 Draft Work Plan.

You may send additional comments by letter regarding the 1993 Draft Work Plan.

I read "the plan". I think the chief Scientists recommendations are excellent, however I believe some species not studied are also in danger. I STRONGLY support finding at least \$22,000,000 for the KACHEMAK BUYBACK! I STRONGLY support Habitat Acquisition. Criteria for Habitat Acquisition should not be limited to labels like "Imminent threat".

I support 93064, 93059 & 93051 especially.

I DON'T SUPPORT 93029 because, we need to save 1st growth trees in Kachemak before saving 2nd growth.

I DON'T SUPPORT 93026 at all!

I DON'T SUPPORT 93009 - In Homer the Pratt Museum has done an excellent job of educating for much less than 1/2 Million \$!

These fees are really excessive! I feel projects need to be let out for private bid. Competitive bidding would drastically reduce costs & enable us to save more habitat plus help another species - the local humans - to survive.

Thank you very much for giving me the opportunity to comment & thanks for (hopefully) listening

If needed, use the space on the back or attach additional sheets. Please fold, staple, and add a postage stamp. Thank you for your interest and participation.

Sincerely
Mr. Bela A. Bodnar
PO Box 200529
Anchorage, AK 99520

COMMENTS

93328178

You are invited to share your ideas and comments with the Trustees.
Please use this tear sheet to present your views on the 1993 Draft Work Plan.
You may send additional comments by letter regarding the 1993 Draft Work Plan.

11/19/92

Dear Trustee Council:

The following are my comments and input on the "1993 DRAFT WORK PLAN":

1. HABITAT ACQUISITION is my #1 priority for fund expenditure. The \$20 million figure you inserted as your tentative figure is far to little. I recommend that up to 80% of the 1993 Exxon payment (after taking care of pre-agreed paybacks) be used for HABITAT ACQUISITION.
2. Do not pay the state funds up front, rather negotiate to pay the state back toward the end of the annual Exxon payments. Negotiate to pay the state in small payments the last two or three years.
3. Save money by putting projects out to competitive bid when ever possible. Also, reduce costs by putting many of 1993 projects in part into AGENCY on-going budgets. Do not dip into EVOS Civil Penalty money as a sole source for funding projects these agencies already had planned to do but couldn't find internal funds for in the past. If these projects need to be done, agencies should put up at least 1/2 as a cost share.
4. Use the \$18 million left over from 1992 funds plus \$4 to \$5 million of excess from the 1993 budget to purchase all in holdings in Kachemak Bay State Park.
5. Delete the moneys earmarked for the Ft. Richardson Fish Hatchery. This is not closely enough tied to spill impacted areas.
6. Delete or reduce project # 93009. It is too late for this.
7. Delete project #93029. Use money acquiring & preserving old growth forests.
8. I support projects #93059, 93060, and 93064

I strongly believe that your mandate is to use the vast majority of civil funds for habitat acquisition. 1993 should be the year to begin these acquisitions with K. Bay be the first followed by as many other impacted or adjacent habitats as is possible. Thank you for the opportunity to comment.

Sincerely,



Richard DeBusman

If needed, use the space on the back or attach additional sheets. Please fold, staple, and add a postage stamp. Thank you for your interest and participation.

93328179

COMMENTS

You are invited to share your ideas and comments with the Trustees.
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Habitat is the key to effective
restoration. (Project # 93064)

Acquire habitat with half the funds -
Use the other half for the studies,
monitoring, assessments.

If needed, use the space on the back or attach additional sheets. Please
fold, staple, and add a postage stamp. Thank you for your interest and participation.

Homer, Alaska

November 19, 1992

Dear Trustees,

On the 17th I was given a copy of the 1993 Draft Work Plan and told if I wanted to comment, I had to make comments by the 20th!

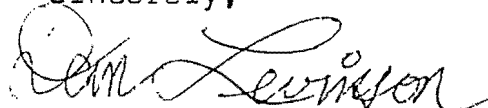
I want to comment, but it's hard to comment intelligently when one is rushed. Decisions you make are important to Alaskans, especially those impacted by the oil spill. Quite frankly, I have no reason to think this exercise will do much good. The Exxon Valdez left trails of oil everywhere in our part of Alaska, but our state government and the oil companies have left trails of subterfuge continually since the spill. We read about it in the papers, hear about it on radio, see it on TV, and one is left with the pessimistic impression that nothing we say will do much good.

I wish it weren't that way. As a "nature-lover," I am angry as hell over the damage that was done in Prince William Sound, and I perceive our use of oil and the companies that produce it as a threat to what I love. As a biologist, I have a special interest in "good science." Hiding data for political advantage may be good politics, but it's lousy science; in fact, it isn't science at all! I've spent a lot of years teaching science, and that means explaining what science is. Withholding information, avoiding scrutiny, and rushing commentary are far from scientific method and don't contribute to the body of knowledge we know as science.

That said, I can tell you I've looked through your work plan and have some impressions. They certainly aren't all scientific, but they do reflect my values and concerns. First, I want to see more money for habitat protection and acquisition. That's your #93064. In particular, Kachemak Bay was touched by the spill and affected in a number of ways. This once pristine body of water is losing its productivity, yet it is still under threat. Plans for timber harvest and gravel extraction, if followed, will doom this region's marine resources for the balance of my lifetime. The beauty of the region, and its value as a tourist attraction will be damaged for the balance of my lifetime. The State of Alaska's failure to protect Kachemak Bay will prove to people all over America that ALASKA IS UNABLE TO PROTECT AND MANAGE HER RESOURCES!

I would also like to say that the administration of these programs seems to require an awful lot of money. I'm glad ADF&G is involved in so many of these projects, but I have to ask if there might be less expensive approaches to getting some of this work done without the loss of quality. There are a hell of a lot of hungry biologists in this state who know how to do good science. Too bad I'm retired.

Sincerely,



Dan Levinson

93328181

COMMENTS

You are invited to share your ideas and comments with the Trustees.

Please use this tear sheet to present your views on the 1993 Draft Work Plan.

You may send additional comments by letter regarding the 1993 Draft Work Plan.

Project 93064 - Habitat Protection Fund needs -

Maximum funding. During the oil spill clean-up I worked on the beach clean-up on the outer coast in Kachemak Bay State Wilderness Park. I feel it is imperative that land acquisition be the cornerstone of all usage of Oil Spill Restoration money. There is nothing that could be done at this point that would be more important for recovering from the Exxon Valdez disaster than to acquire land in the areas affected by the spill. Certainly, the lands in Kachemak Bay State Wilderness Park and K.B. State Park were directly affected by the spill and should be purchased for protection. Also, lands in Prince William Sound and Kodiak were devastated by the spill and should be purchased for protection.

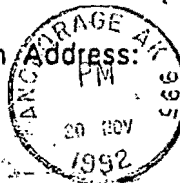
If needed, use the space on the back or attach additional sheets. Please fold, staple, and add a postage stamp. Thank you for your interest and participation.

Additional Comments:

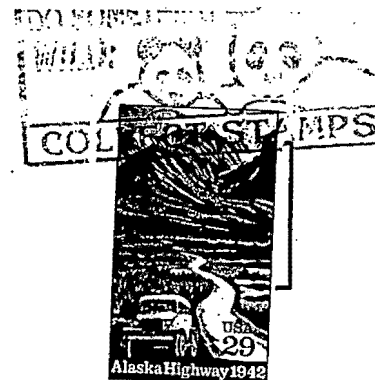
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Return

Address:



JIM LEVINE
7343 LINDEN DR
ANCH. AK. 99502



Exxon Valdez Oil Spill Trustee Council
645 G Street
Anchorage, AK 99501

Attn: 1993 Draft Work Plan

93328182

COMMENTS

You are invited to share your ideas and comments with the Trustees.

Please use this tear sheet to present your views on the 1993 Draft Work Plan.

You may send additional comments by letter regarding the 1993 Draft Work Plan.

I do believe that the most important project though many are also important is the Habitat Protection fund. In particular we need to address areas of greatest threats IE: Kachemak Bay & Kodiak. I would like to see more emphasis in this project #193064 for funding? 22 million to purchase SNA properties to protect the Habitat of Kachemak Bay is well worth every penny. Kachemak Bay has the greatest diversity and density of anywhere in the state and any mismanagement of this area is basically ruining or overdeveloping. I would certainly crush one of the most spectacular marine and wildlife habitats the state has to offer. It's coastline offers vast areas for nesting birds but they are fastly whored. I see sand hill cranes, arctic terns and marbled murrelets nesting in land 1-5 miles. Moose, bear, goats are abundant. I guide during the summers in Kachemak country so I know how important the wildlife/marine life is to it's ever growing tourist industry. The development here has grown so fast in the last 15 years that we owe it to the state and it's precious land & waters better protection of it's habitat, money spent NOW or it protection will come back ten fold from the 100's of 1000's of people that visit every year just to see it.

If needed, use the space on the back or attach additional sheets. Please fold, staple, and add a postage stamp. Thank you for your interest and participation.

On really surprised projects such as St Rich Hatchery is even a consideration. Does it relate to the oil spill? where will the fry be stocked?
river

Additional Comments:

I want to see projects that will truly benefit Alaska and give it a return on its investment IE: #93069 given priority. Thank you.

Rick Harnes

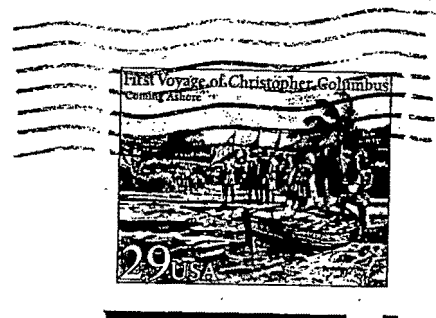
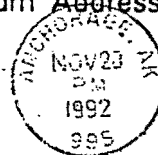
(fold here)

Return Address:

RICK HARNES

RED MT ALASKA

Homer AK 99603



Exxon Valdez Oil Spill Trustee Council
645 G Street
Anchorage, AK 99501

Attn: 1993 Draft Work Plan

COMMENTS

You are invited to share your ideas and comments with the Trustees.
Please use this tear sheet to present your views on the 1993 Draft Work Plan.
You may send additional comments by letter regarding the 1993 Draft Work Plan.

I see the projects in the Oil Spill Trustees Draft Work Plan as highly variable in quality, especially in degree of relationship to oil spill damage and cost effectiveness. The Trustees seem all too willing to dispense large quantities of money for small or questionable gains.

Some projects seem definitely relevant and worthwhile: 93003, 93022, 93030, 93033, 93036, 93038, 93039, 93045, 93047, 93050, and 93059-62 all promote restoration and/or provide data that will be useful in the future.

But as far as I can tell, projects 93011, 93014, 93018-20, 93024-26, 93028-29, 93032, 93034-35, 93042 and 93063 all seem to have only a marginal relation to the oil spill or else lack effectiveness. For example, I fail to see how establishing a new mariculture facility can be called restoration. Other projects, such as 93028, 93029 and 93034 are not likely to be cost effective. "Ma Nature" can do a better job at much lower cost. Also, while projects 93006 and 93007 (archeological) are certainly needed and valuable, I question whether projects 93008 and 93009 add very much, except cost.

It seems to me that the Trustees have given far too little attention and MUCH TOO LOW funding to Project 93064, Habitat Protection. I note that the public has been overwhelmingly in favor of habitat acquisition and protection, as even the Trustees admit. I hope the Trustees will be responsible and responsive to the people whom they are supposed to serve and act more fully on their desires. I trust that work has proceeded under Project 93059 and I urge the Trustees to drop or cut back their many marginal projects and put the money into protecting habitat so that Nature can restore itself.

Nancy Levinson
184 W. Bayview Ave.
Homer, Alaska 99603



If needed, use the space on the back or attach additional sheets. Please fold, staple, and add a postage stamp. Thank you for your interest and participation.

Additional Comments:

----- (fold here) ----- Return Address:

Place
Stamp
Here

Dan N' Nancy Levinson
184 West Bayview Avenue
Homer, Alaska 99603


Exxon Valdez Oil Spill Trustee Council
645 G Street
Anchorage, AK 99501

Attn: 1993 Draft Work Plan

43328184

Box 42, Torrey Hill Road
Turner, ME 04282
November 16, 1992

Exxon Valdez Oil Spill Trustee Council
645 G Street
Anchorage, Alaska 99501

Dear Council Members:

I am writing with comments on Exxon Valdez Oil Spill project number 93009 entitled Public Information Education and Interpretation.

Although the people of Southcentral Alaska were most directly affected by the spill, I am disappointed to note that the public information outreach appears to target only them and others fortunate enough to visit this area.

In September, 1989, I participated in the volunteer beach cleanup at Mars Cove on the Kenai Peninsula. This experience made a tremendous impression on me and when I returned to Maine I put together a slide show with pictures I had taken, along with some I had bought, which showed events of the early days of the spill.

In the last three years, I have presented this show to nearly 5000 people most of whom were school children of all ages.

In the question and answer period following each presentation, one of the questions most often asked is about the long range effects of the oil on the environment. People seem moved and concerned about this aspect and from this sampling I believe this question is common to many Americans.

To date, there appears to have been little information given the public through national media to answer this question.

I suggest that a well thought-out media plan for keeping America and the rest of the world informed on the nature and progress of these many worthwhile projects, listed in the 1993 Draft Plan, would be an excellent way to spend a comparatively small amount of the money gained in the settlement with Exxon.

In addition, if key parts of representative projects were filmed professionally as those projects developed, a documentary suitable for television could be put together.

Exxon Valdez Oil Spill Trustee Council

Page 2

November 16, 1992

An informed public can be a tremendous resource to draw on to support cleaner, safer and more efficient ways to handle and use this dwindling resource in the future.

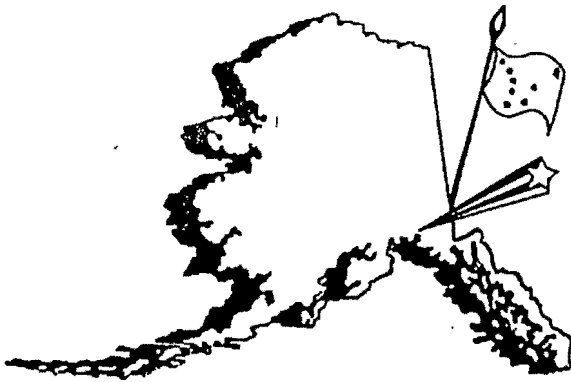
People cannot do so if they are left in the dark.

I urge the council to give serious consideration to these suggestions and wish you the best in your tasks ahead.

Sincerely,


Jack Biscoe

93328185



VALDEZ NATIVE ASSOCIATION

P.O. BOX 1108
VALDEZ, ALASKA 99686

PHONE: 835-4951

November 19, 1992

Exxon Valdez Oil Spill Trustee Council
645 G Street
Anchorage, Alaska 99501

Attention: 1993 Draft Work Plan

Gentleman:

This letter is in response to your request to the public for participation in the work being done by your Oil Spill Restoration Planning Work Group.

We are an organized Non-Profit Native Association with a membership of 250 persons who live in the Valdez area.

Our people have been impacted greatly by the oil spill, as documented by many published studies and the media. Yet, we seem to have been left out of your work-plan, your mailings and have had to find out about organizations like yours second hand.

Please put us on your mailing list and/or calling list when you have meetings. We feel that we can be an effective voice for our membership, and for input from this area. We want to take an active part in any work-plans that affect our area.

Sincerely,

A handwritten signature in cursive script that reads "Helmer J. Olson".

Helmer Olson, President



IN REPLY REFER TO:
NR14

United States Department of the Interior

NATIONAL PARK SERVICE

Wrangell-St. Elias National Park / Preserve

P.O. Box 29
Glennallen, Alaska 99588



November 20 1992

Draft 1993 Work Plan Comments
Exxon Valdez Trustee Council
645 G Street
Anchorage, AK 99501

Dear Trustee Council;

Resource management would like to urge your support of project #93052, "Identification and Protection of Important Bald Eagle Habitats". Wrangell-St Elias National Park and Preserve (WRST) is supportive of this project since bald eagles which nest in the Park probably use Prince William Sound on a seasonal basis and may therefore be affected by events that occur in that area. Eagles do not breed until they are 4 years of age. Prince William Sound may also be an important area for immature eagles which will later breed in interior areas. Additionally, WRST has coastal bald eagle habitat which may be affected by future oil spills or other impacts. Information collected in this study has potential application for WRST as well as other Parks and coastal areas.

1) It is important that all habitats and nests are identified in order to be able to measure impacts of current and future oil spills or other disasters. We cannot measure impact unless we have an inventory of what exists. The proposed project will identify habitat/nests in areas not previously surveyed during damage assessment studies. Bald eagles suffered direct and indirect mortality during the 1989 oil spill and afterwards. Cooperative work with private land owners and governmental agencies to identify and protect remaining habitat will help this species recover and will benefit other species which utilize similar habitat (e.g marbled murrelets) as well.

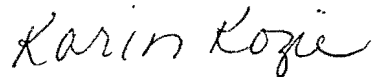
2) Long term effects of environmental contamination are not always detected with short-term studies. Bald eagles, as top level predators, are generally good indicators of environmental contamination. Embryos are often more vulnerable to the effects of contaminants than adults, resulting in productivity being a sensitive indicator of environmental contamination. However, decreases in productivity or other sub-lethal effects of contaminants often may take many years to detect. Productivity surveys should be continued to determine subtle changes in

population levels and should include information on non-breeding eagles.

3) Several hundred thousand dollars have been invested in radio-tagging bald eagles in Prince William Sound. With many of these radioes still operating, at the very least, these birds should continue to be monitored. Monitoring radioed eagles will provide information on seasonal habitat use, identify important feeding areas (this is especially important for non-breeding, immature eagles for which there is very little known and which are very difficult to monitor without radioes) and breeding areas, survival, and obtaining unbiased productivity and population estimates (e.g. radioed birds can be used to correct for error in population and productivity estimates).

Thank you for the opportunity to comment.

Sincerely,

A handwritten signature in cursive script that reads "Karin Kozie".

Karin Kozie
Resource Management Specialist

11/19/92

Dear Trustee Council:

The following are my comments and input on the "1993 DRAFT WORK PLAN":

1. HABITAT ACQUISITION is my #1 priority for fund expenditure. The \$20 million figure you inserted as your tentative figure is far to little. I recommend that up to 80% of the 1993 Exxon payment (after taking care of pre-agreed paybacks) be used for HABITAT ACQUISITION.
2. Do not pay the state funds up front, rather negotiate to pay the state back toward the end of the annual Exxon payments. Negotiate to pay the state in small payments the last two or three years.
3. Save money by putting projects out to competitive bid when ever possible. Also, reduce costs by putting many of 1993 projects in part into AGENCY on-going budgets. Do not dip into EVOS Civil Penalty money as a sole source for funding projects these agencies already had planned to do but couldn't find internal funds for in the past. If these projects need to be done, agencies should put up at least 1/2 as a cost share.
4. Use the \$18 million left over from 1992 funds plus \$4 to \$5 million of excess from the 1993 budget to purchase all in holdings in Kachemak Bay State Park.
5. Delete the moneys earmarked for the Ft. Richardson Fish Hatchery. This is not closely enough tied to spill impacted areas.
6. Delete projects # 93009, 93026, and 93029.
7. I support projects #93059, 93060, and 93064

Thank you for the opportunity for public comment. I can not emphasize enough my strong feeling that land acquisition is the priority with the remainder of these civil funds. All other projects are secondary to land acquisition.

Sincerely,

Nancy Donaldson

Nancy Donaldson

830 Lanark St.

Wasilla, Alaska

99654

COMMENTS

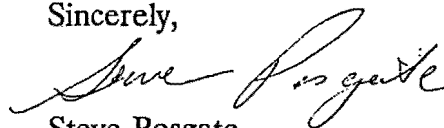
You are invited to share your ideas and comments with the Trustees.
Please use this tear sheet to present your views on the 1993 Draft Work Plan.
You may send additional comments by letter regarding the 1993 Draft Work Plan.

My comments refer to one specific shortcoming: the bias toward research at the expense of habitat protection and purchase.

I appreciate the effort put forward by the Trustees, however, I do not see that their interests reflect those held by the spill victims. The plan directs millions of dollars into the land and resource departments of the Federal and State governments and none toward habitat protection and purchase. I see this as a serious breach of the trust relationship that exists between the Trustees and the victims of the spill. The 1993 Draft Work Plan looks more like a jobs program for researchers and bureaucrats than a restoration plan.

I hope that 80-90% of available funds be directed to habitat purchase and acquisition. This is drastically different from the 1993 Draft Work Plan but it better reflects the interests of the spill victims.

Sincerely,



Steve Posgate
14549 Don Circle
Eagle River, AK 99577

If needed, use the space on the back or attach additional sheets. Please fold, staple, and add a postage stamp. Thank you for your interest and participation.

93328189

Exxon Valdez Oil Spill Trustees
645 "G" Street
Anchorage, AK 99501

November 19, 1992.

Dear Sir,

Thank you for the opportunity to comment on the 1993 Draft Work Plan.

I would first like to address the general direction of restoration efforts represented by the projects included for consideration in the 1993 Draft Work Plan. Many of the projects listed are not directly connected to spill damage and should be funded with the government agencies own budgets. It seems clear that many of the agency sponsored projects fall under the category of ongoing research and or resource management and should not be funded from civil or criminal settlement monies.

The severe damage which was done by EVOS to recreational and wilderness values has been completely overlooked in the Draft Work Plan. Lost services in this category are best compensated by the acquisition of equivalent resources in the form of substantial tracts of forested wildlife habitat. Entire watersheds should be purchased and protected; land management plans which seek to provide only buffer strips are completely inappropriate and would not be compatible with public opinion which has favored substantial acquisition proposals such as those included in House Bill 411 (passed by both bodies of the state legislature in 1992).

Specific Project Comments

93029 Prince William Sound Second Growth Management

This project should not be adopted, it is a waste of settlement funds, it is experimental in nature and will provide little or no return. USFS should fund their ongoing resource management projects out of their own budget. ADF&G Technical Report 85-3 documents the lack of success in managing second growth for wildlife. Poor understory forage value, lack of mature trees, and lack of winter cover characterize the extremely poor habitat values associated with second growth.

93009 Public Info., Education and Interpretation

It seems unlikely that government agencies (USFS lead agency) reporting on their own activities will provide "balanced and accurate information on the oil spill". In 1989 the USFS under Tongass Regional Forester Mike Barton released a public relations informational document "TLMP, Designing the future". The TLMP document was heavily criticized for blatant misrepresentation of resource information and became the subject of a congressional committee inquiry. Among the problems associated with the document was a fabricated quote attached to a picture of a Southeast Alaska conservationist,

Project # 93009 should not be adopted.

Project # 93005, # 93006, # 93007, Archeology - Education, Restoration, Site Stewardship, Patrol

Every effort should be made to employ local expertise in these undertakings. This is particularly important in the Kodiak area where Kodiak Area Native Association staff have a good record for cost efficiency and possess a great deal of local knowledge. I am concerned that the sponsoring agencies will absorb the bulk of the funds and pass much of the contracting work to outside interests who are only moderately qualified.

Project # 93006, # 93007, # 93008, Archeology -
Restoration, Site Stewardship, Patrol

All of these projects should be reviewed to see if it is more practical, effective and cost efficient to survey and remove artifacts to protect archeological resources. These projects may just further expose sites to the public and result in more damage.

Project # 93025 Montague Island Chum Salmon Restoration
USFS stream habitat manipulation work is still in it's infancy in Southeast Alaskan projects. The agencies predicted prospects for success in the project description are questionable. This project falls under the category of ongoing agency research and resource management and should be funded with the Forest Services' own budget.

Project # 93026 Fort Richardson Hatchery Water Pipeline
This project is only remotely connected to the oil spill and is in no way shape or form a priority. It should not be adopted with civil or federal criminal settlement monies. It may warrant consideration for state criminal settlement funds.

Project # 93028 Restoration and Mitigation of Wetland Habitats
Should not be adopted. This project would be of very limited value to species injured by the spill and it would not be cost effective. It makes far more sense to protect other undisturbed natural wetlands. This project is experimental in nature and is part of ongoing agency resource management; it should only be funded out of the USFS own budget.

Any proposed large scale habitat alteration proposal should be rejected if it alters natural succession and further harms wilderness values injured by the EVOS.

Project # 93052 Identification and Protection of Important Bald Eagle Habitats.

This project should be funded. Studies completed to date are insufficient to make a determination of population stability. Nesting sites must be surveyed and a determination made of the status and placement of mature breeding birds. Eagle populations which appear to be stabilized should not be reinjured through logging operations. This project should be a priority.

Project # 93064 Imminent Threat Habitat Protection

This project is a priority and should be adopted. Funding should be increased by \$10 million to be consistent with public opinion which has stressed imminent threat habitat protection.

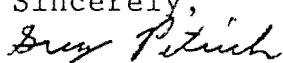
Project # 93034, # 93035, # 93036, # 93038, # 93042, # 93043

All of these projects are damage assessment projects and give no clear indication of what if anything practical could be done to restore the injured area or species to normal conditions. No projects which have ambiguous impractical goals should be funded; all of these projects fall into this category.

All fisheries project should be reviewed for direct connection to the spill. Projects which are a basic agency management responsibility should be funded from another source.

Introduction of disease to wild stocks is a very important factor to review in many proposed projects

Thank you very much for the hard work which the restoration team has put into the 1993 Draft Work Plan.

Sincerely,

Greg Petrich
Conservation Chair,
Kodiak Audubon

Dec 1005



7E-28190

November 20, 1992

Draft 1993 Work Plan Comments
Exxon Valdez Trustee Council
645 G Street
Anchorage, AK 99501

RE: 1993 Draft Work Plan

Dear Trustees:

Kachemak Heritage Land Trust (KHLT) is a non-profit organization located in Homer dedicated to preserving the natural heritage of the Kachemak region for public benefit. KHLT protects wildlife habitat, community greenbelts, and open space through the acquisition of land and conservation easements. We are pleased to offer the following comments on the draft 1993 Work Plan.

GENERAL COMMENTS

1. The Trustee Council should focus its restoration actions on those projects which are time critical and/or would otherwise be a lost opportunity prior to the completion of the Restoration Plan. Restoration Projects in 1993 must capitalize on available opportunities to provide protection for habitats linked to natural resources injured by the oil spill. The 1993 focus must be on protecting land facing imminent threat and/or where the lack of action could foreclose restoration opportunities.

2. Project number 93064 (Habitat Protection Fund) is the top priority. Project Numbers 93059 (Habitat Identification Workshop) and 93060 (Accelerated Data Acquisition) are necessary components of habitat protection.

3. The cost of many of these projects is quite high. Furthermore, it appears that state and federal agencies are suggesting projects that are not spill-related. Many projects are appropriately funded from existing agency budgets. The civil settlement monies should not be considered the sole source for funding these extraneous projects. We urge the Trustee Council to stretch its dollars as far as possible to achieve maximum restoration. Wherever possible, costs could be reduced by asking for "Requests for Proposals" for certain project services. This could lower costs and offer some economic return to the spill-affected communities. For example, Homer's Pratt Museum has already undertaken a project very similar to Project Number 93009. Partial funding from this project to the Pratt Museum could extend the reach of their excellent public education effort.

SPECIFIC COMMENTS

Project Number 93064:

This is the highest priority project. The public comment to date is squarely and overwhelmingly in favor of habitat protection. The amount of money recommended for this project is wholly inadequate. A major portion of the Trustee Council's resources should be allocated to this project.

Protection of whole ecosystems is the single-best tool for insuring the viability of species injured by the oil spill. Project 93064 offers the Trustees the opportunity to purchase private holdings within Kachemak Bay State Park ("Park") and other spill-affected areas.

State park land is the highest protection the state offers its lands. The Park contains anadromous streams and other habitats for species injured by the spill (for example, bald eagles, marbled murrelets). Private lands within the Park should be acquired because the land is highly qualified to serve as replacement for lost recreation and wilderness services as well as habitat for injured species. Seldovia Native Association, Timber Trading Company and Cook Inlet Region, Inc. had reached agreement with the State of Alaska to sell their holdings. Due to a gubernatorial veto of monies for park acquisition, this deal is no longer extant and needs to be renewed. The heart of Kachemak Bay State Park is slated for clear-cut logging in 1993. Kachemak Bay State Park is unquestionably "imminently threatened" and deserves immediate action to protect it.

The criteria for habitat acquisition, however, must not be restricted to those lands under immediate threat. There are many instances where lands are available now, but not slated for development. If the Trustee Council waits for the threat to develop, the cost of acquisition will undoubtedly be higher as the landowner's investment will be greater. The criteria for acquisition should recognize special opportunities and be drawn as broadly as possible.

Project Number 93059:

This is clearly a worthy project directly related to the Exxon Valdez Oil Spill. We are concerned, however, that the public is being asked to comment on a project that is already well underway. We urge the study utilize both scientific and local expertise in identifying habitats. Many long-term residents and visitors to the spill-affected areas have unique on-the-ground experience which is often overlooked.

Project Number 93060:

We support this project, with only one exception. The inclusion of information on the spruce bark beetle infestation is completely unrelated to the oil spill and should not be included in the data-gathering. The presence or absence of spruce beetles is an inappropriate criteria for determining restoration projects. Furthermore, the Alaska Department of Natural Resources and U.S. Forest Service are capable of gathering this information using existing agency resources.

Kachemak Heritage Land Trust appreciates this opportunity to comment. We look forward to working with the Trustee Council to achieve restoration for Kachemak Bay and the outer coast of the Kenai Peninsula.

Thank you.

Respectfully submitted,

Barbara Sax Seaman/sk

Barbara Sax Seaman
President

11/19/92

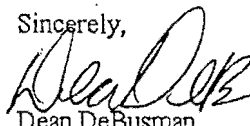
Dear Trustee Council:

The following are my comments and input on the "1993 DRAFT WORK PLAN":

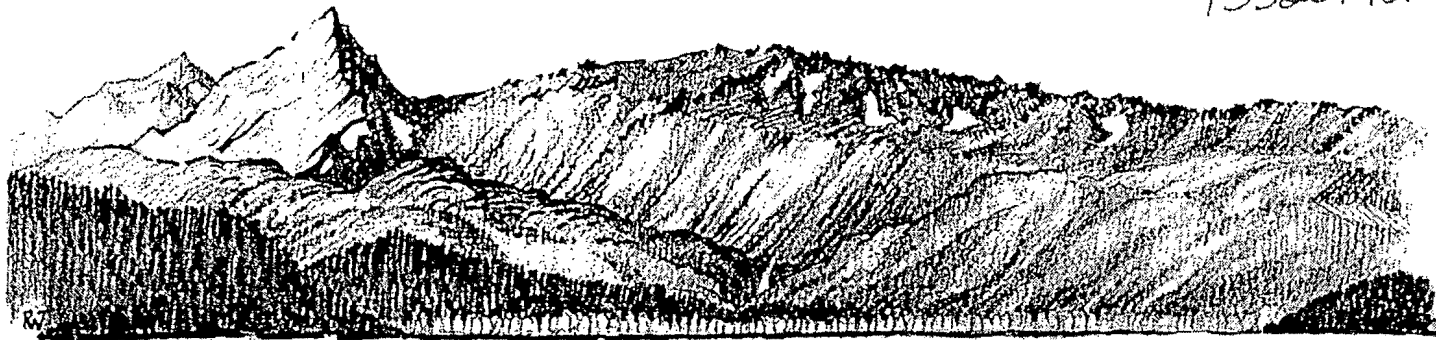
1. HABITAT ACQUISITION is my #1 priority for fund expenditure. The \$20 million figure you inserted as your tentative figure is far to little. I recommend that up to 80% of the 1993 Exxon payment (after taking care of pre-agreed paybacks) be used for HABITAT ACQUISITION.
2. Do not pay the state funds up front, rather negotiate to pay the state back toward the end of the annual Exxon payments. Negotiate to pay the state in small payments the last two or three years.
3. Save money by putting projects out to competitive bid when ever possible. Also, reduce costs by putting many of 1993 projects in part into AGENCY on-going budgets. Do not dip into EVOS Civil Penalty money as a sole source for funding projects these agencies already had planned to do but couldn't find internal funds for in the past. If these projects need to be done, agencies should put up at least 1/2 as a cost share.
4. Use the \$18 million left over from 1992 funds plus \$4 to \$5 million of excess from the 1993 budget to purchase all in holdings in Kachemak Bay State Park.
5. Delete the moneys earmarked for the Ft. Richardson Fish Hatchery. This is not closely enough tied to spill impacted areas.
6. Delete or reduce project # 93009. It is too late for this.
7. Delete project #93029. Use money acquiring & preserving old growth forests.
8. I support projects #93059, 93060, and 93064

I strongly believe that your mandate is to use the vast majority of civil funds for habitat acquisition. 1993 should be the year to begin these acquisitions with K. Bay be the first followed by as many other impacted or adjacent habitats as is possible. Thank you for the opportunity to comment.

Sincerely,



Dean DeBusman
830 Lanark St.
Wasilla, AK 99654



Kachemak Bay Wilderness Lodge

EVOS Trustee Council
645 G St.
Anchorage, Alaska 99501

Nov 19, 1992

Members of the Council

Ref. 1993 Draft Work Plan

I regret the short time allowed for the public to be involved in this process. Case in point, Dr Spies letter concerning the workplan at the end of the book is dated as recently as Sept 22. I only became aware of this document a few days ago and believe that greater public participation can and should be achieved in the future.

I was the founder of the Center for Alaskan Coastal Studies and have remained on the Board since its inception. The Center has been a 501-c-3 non profit since 1981. Our goals of research, education and land conservancy, and our strong track record of environmental activism in these areas gives this organization an interest and desire to be involved in this process. We appreciate the opportunity to be involved in this review.

I am writing this letter as a private citizen and business owner who has lived and operated a business on the coast of Kachemak Bay continually since 1969. I did clean up oil on the beaches directly below our lodge living room windows after the spill. I housed cleanup crews at our Chenik Brown Bear Photography Camp in Kamishak Bay when the oil went ashore there. I have been actively involved, in many ways with EVOS since it happened. Most recently I testified as one of the "Experts" responding the the questionnaire process overseen by Nature Conservancy.

Regarding Dr Spies letter: I think that his 4 points at the outset are in exactly reverse order. Many things can be done in the water and on the watershed to mitigate some of the damage. Much of it needs to be addressed QUICKLY for example, the clearcutting of slopes above the EVOS shoreline. In many places along the oiled coast, and especially in Kachemak Bay, there are values in place,

recreation, tourism, wilderness which will be completely lost if clearcutting of the Kachemak Bay State Park takes place. The injured species are found in this area and others like it in healthy abundance and the Council should put much more emphasis on habitat acquisition or protection than I see currently being proposed in the Draft Plan.

Taken in reverse order, Dr. Spies comments are well taken and I approve of them in concept.

As a layman I am not in favor of "studying the issue to death" and using up a great deal of money and resources that way. It will be a great tragedy if we study the heck out of the barn while the door is left open and the horse walks out. As a scientist it is natural that he and others like him think that "further defining damage" should be #1. Naturally there is the need for ongoing studies but your view of this need as suggested by scientists should be tempered by a look at the immediacy of the threats. I would like for you to work to lessen the continuing negative effects on not only the threatened species but the ecosystem as a whole.

Paragraph 3 of Dr Spies letter continues the line of reasoning which I think is flawed, "study and clarify injury and document recovery. Again I want to point out that the people on the shore of EVOS want the watershed protected and spending so much more on studies isn't what the people want.

Later in that paragraph he suggests an endowment. There may be a time and place for an endowment in some form, but the Trustees should be reminded that the Alaskan House and Senate suggested to the Governor how settlement monies should be spent. This was a large grassroots effort from the people in the effected communities on the oiled shorelines. It is clear that the Governors plan for an endowment went against the mainstream of what the people want. This was unfortunate to say the least for all of us. A very numerous and diverse group, unified in this effort primarily aimed at habitat protection. The voices of hundreds and thousands of people who worked for this concern should be heard in my letter. I would hope to call attention to their concerns even though you are not hearing from them in this comment opportunity on the Draft Plan.

I have carefully studied Craig Matkins review of the Draft Work Plan and would like to add my voice to his. I hope you will give his comments careful and serious consideration. I believe that he has a better view of plan and its individual parts. Instances in Dr Spies comments where it seemed his reach exceeded his grasp and his advice was ill informed.

Scientists living and working on the EVOS shore should be -
listened to carefully.

Respectfullly yours,



Michael McBride

National Parks

PO Box 202045
Anchorage, AK 99520
November 19, 1992

Draft 1993 Work Plan Comments
Exxon Valdez Trustee Council
645 G Street
Anchorage, AK 99501

Dear Members of the Trustee Council,

I am writing on behalf of the National Parks and Conservation Association (NPCA), the only national non-profit citizens organization that focuses on park concerns. Our 330,000 members nationally, including over 2,300 Alaskans, promote the protection, preservation and public understanding of our nation's national park system through various activities. We have followed closely the aftermath of this oil spill and have participated in nearly all public opportunities to advocate for the assessment and restoration of nationally and internationally significant resources, particularly those of Kenai Fjords National Park, Katmai National Park and Preserve and Aniakchak National Monument and Preserve.

We appreciate this opportunity to comment. Before addressing specific proposed projects, we offer the following:

The criminal plea agreement specifically allows for "long-term environmental monitoring". The consent decree and the Memorandum of Agreement (the funds to be spent by this work plan) do not. The MOA defines restoration to mean that all injury assessment is to be directed through returning resources or services to their pre-spill conditions. Monitoring and injury assessment contribute nothing to recovery of injured resources and services. Many proposed projects fall into the monitoring category and could be seen as an illegal use of civil funds.

The theory behind the division of settlement money has been shown to be no longer valid. Restitution (sometimes referred to as the criminal) funds were for emergency uses while the civil funds were for planning. Apparently no emergencies were identified and a restoration plan remains unfinished.

The Trustees as defined by the MOA, and implicit in the law, are to act as "trustees of natural resources injured, lost or destroyed as a result of the spill". A cursory review of the proposed projects

Draft 1993
page 2

show the Trustees acting on behalf of their own agencies and/or political agendas, not the resources. Funding studies conducted by the same agencies represented by members of the Trustee Council is a de facto conflict of interest. The continuing complete lack of attention to those legislatively designated conservation units further illustrates this point. The designation of state parks, national parks and national forests does not happen in a vacuum: elected legislative bodies debated and studied for years before setting into law protections for those areas important to all of us. The Trustee Council has consistently ignored this legislated recognition of our natural and cultural resource values.

The big picture remains unclear. This draft does not provide complete information. Detailed budgets, although listed as available for public viewing, are not available. The fate of each idea submitted could have easily been included in the draft. On page 25, twice it is stated that the Trustee Council has deleted projects from consideration. What are those projects and what criteria was used for deletion? Where is the list of "considered but rejected"? Project numbers are not sequential; numbers are missing. Why? The draft's repeated assurances that public opinion is very important seem hollow. For example, no specific habitat acquisition projects proposed by the public were included in this draft.

What has been accomplished thus far? The Framework Document and Supplement and the 1992 Project Work Plan are in place. Where are the progress reports? How can the public judge projects within context without the context? It appears the Appendix A: Summary of Injury is the same information presented in the Framework Document. Can we assume we have learned nothing new for the \$18 million spent?

It is unclear to us how compliance with the National Environmental Policy Act is being met. For example, originally the National Park Service decided that 93006, Site-Specific Archeological Restoration, was categorically excluded. Further review, however, convinced NPS that preparation of an Environmental Assessment was required. What other projects are underway without appropriate compliance?

The statement on page 12, "Although there are sufficient funds available to restore resources and services injured by the spill, there are not sufficient funds available to conduct all of the studies and projects which have been suggested and to acquire all of the habitat already proposed, and thus there must be a prioritization of restoration activities to be conducted in 1993," puzzles us. The injury assessment is not done; the final injury report is not done; there is no restoration plan; there is no implementation plan for restoration: so how exactly do we know

Draft 1993

page 3

there are sufficient funds available to restore resources and services injured by the spill?

The 1993 Administrative and Restoration Team Support Budgets (page 24) offer no way to understand or compare data. FTEs would help. It is our understanding the REST. TEAM figures are for one person per agency. Why does it cost over three times as much for ADEC as for USDI? It is our understanding that USDA (USFS) has a ongoing GIS system program and that ADF&G does not; ADF&G figures are over three times those of USDA. Are the costs for ADF&G to begin a system? If so, why are those costs appropriate for settlement funds? RPWG figures reflect staff. Why are USDI costs so low?

The peer review process needs to be expanded and to be more rigorous. One reviewer is not sufficient. Without rigorous review and adherence to the highest possible scientific standards, the public can be handed sloppy, casual "drive-by" science that can happen when administrators need science done quickly to meet policy or budget needs. The National Research Council of the National Academy of Sciences could be asked for a workable structure.

Further, scientific studies should not be conducted by agencies or contractors selected by agencies and/or Trustees without a competitive bid process and adequate peer review. Funding studies conducted by the same agencies represented by the members of the Trustee Council who vote to fund those studies can be viewed as a breach of public trust.

There is still no proposed project that addresses lost services. Yet, the trust responsibility clearly includes restoring services injured by the spill.

The resources management agencies represented by the Trustee Council have statutorily defined mandates to manage and protect those natural and cultural resources on behalf of the public. Attempts by these same agencies to fund ongoing programs with settlement funds are not appropriate. Information is needed regarding how proposed projects differ from ongoing statutorily mandated programs.

While we continue to support projects focused on restoration of park resources, including archeological (cultural) resources, we think the above reasons compelling to warrant the Trustee Council setting aside all projects until the completion of the restoration plan. The settlement funds are being nickel-and-dimed away before the big picture is in full view.

The overriding priority for restoration needs to be habitat acquisition and protection to protect the ecosystem from further damage, thereby maximizing the opportunity for injured resources

and services to be restored. It is a basic tenet of modern resources management that resources need to be managed at the ecosystem level. Checkerboard ownership patterns seriously compromise effective management and frustrate private owners and development. Acquisition of extended buffers or conservation easements seldom prevent detrimental changes in hydrology, erosion, wildlife migration corridors and breeding areas, viewsheds and remote wilderness values.

Finally, it is unclear when the comment deadline is. One statement "Written comments ... must be received by November 20, 1992, at the following address" conflicts with "Comments must be postmarked by November 20, 1992". We think it unreasonable for the Trustee Council to have analyzed all comments and made documents available within sufficient time for public and Council member review prior to the December 11th public meeting.

Concerning specific projects, we offer the following:

93005: While we support this cultural resource information, education and interpretation program, we think Native organizations need more active involvement.

93006: We support this project only if it is to be continued. This project is an example long-term restoration efforts. Short-term funding will provide useful information but will not be productive for resource protection and restoration.

93007: We support this project but do not support ADNR as the lead agency because staff are not in place for this project. Again, Native organizations need active participation.

93008: We support adding agency presence to protect these resources. Increased vandalism and looting at over 24 sites has been traced to the nearly 10,000 clean-up workers who were throughout the oil spill area. Since the presence of police deters criminal and anti-social activities, more uniformed presence during the summer will deter looting and vandalism.

93009: We do not support this project as listed. Providing the public with information about existing conditions, eco-tourism recreation opportunities and interpretation of the Sound are already ongoing responsibilities of the US Forest Service. NPS proposed a similar project, more clearly focused on oil spill education that the USDI Trustee member voted to kill.

There continues an excessive emphasis on commercial fishery projects. Over \$8.6 million is proposed for management actions and studies for pink, chum and sockeye salmon for which spill-related injury is not documented. The scientific reviewer found that 11 of

Draft 1993
page 5.

the 15 projects related to commercial fish had no linkage with spill injury. Most of the proposed projects are clearly ongoing statutorily mandated responsibilities of ADF&G. Consequently we do not support 93012, 93014, 93024, 93026, 93030, 93031, 930630.

While we are supportive of projects that monitor and survey species and systems, we remain concerned about collecting information on the short-term that will not be productive for restoration. We tentatively support 93010, 93033, 93034, 93035, 93036, 93038, 93043, 93041, 93042, 93045, 93046, 93047, 93051, 93052 and 93053 with many unanswered questions about exactly how each project fits into overall restoration of resources and services.

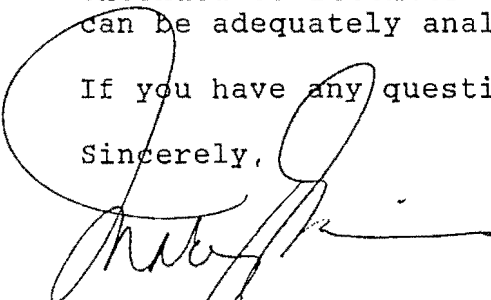
The process implemented by the Nature Conservancy remains limited to "experts" and ignores local common knowledge and expertise found in spill-impacted communities. Thus far, no members of the public have been invited to contribute their expertise. 93059 and 93060 need to include this needed expertise.

93064: We support this project since it is the only one that begins to address habitat acquisition. Funding should not be limited to an arbitrary figure nor should it be tied to an imminent threat.

In closing, we remind the Trustee Council of their legal responsibilities for our resources injured, lost or destroyed as a result of the Exxon Valdez oil spill. We ask for the completion of a restoration plan, the big picture, before more settlement funds are spent. We continue to support habitat acquisition and protection as the priority for restoration. We continue to ask for recognition of the importance and the restoration of legislatively designated resources values. We ask that comment period be extended to December 11th so testimony presented at that meeting can be adequately analyzed.

If you have any questions, please let me know.

Sincerely,



Mary Grisco
Alaska Regional Director

To: EXXON Valdez Oil Spill Trustee Council

Re: Draft 1993 Workplan

Dear Trustee Council;

As an impacted citizen of the EXXON spill, I am disgusted with the 1993 workplan! There are 3 spending guideline areas, yet the workplan heavily emphasizes restoration/enhancement projects (many questionable. . .check your Chief Scientist's report more closely) while ignoring prevention, response, and monitoring. As a punctuation to this loaded emphasis I find almost the entire plan administered by the very state and federal agencies which make up the council and restoration team! Is this fair? Surely, there are other entities which merit not only consideration, but the awarding of a portion of these settlement funds.

In order to avoid more "incidents" and their tumultuous aftermath, I would suggest these funds be appropriated towards prevention, better response, and monitoring. Strategically placed response equipment; a tug assist/escort vessel or two, and a bona fide hydrocarbon monitoring program could be placed in Cook Inlet. For the money that is being tossed out on the 7 projects that have a "low probability of contributing to recovery" as described by your Chief Scientist, these 3 items would be thriving! Spending in these areas makes sense. Much of the 1993 workplan does not!

It appears the agencies entrusted with these funds have merely decided how to fit the dollars into their own pockets. I am thoroughly disgusted! Imagine if you will these funds were set aside for cancer sufferers. Your way of spending has us looking into how some cancer patients have been fairing, and how some non-cancer patients can improve. Your proposed studies will look into gravesites of former victims and check possible spots for the future. Your way of spending collects data on the number of hospital beds available, and ways to increase that number. Your spending plan does not address how to help prevent the disease, how better to respond, or how to keep track of the spread of it. It's obvious you have ignored perhaps the most important spending area! Let's see some ethical responsiveness from your council. . .throw out these marginal projects and put in proposals from the public, that will protect the people and gain their trust in this process. These are the Alaskan people's settlement funds, let's use them for the greatest good, not to feather overseeing agencies' nests!

Sincerely,



Karl Pulliam

PO Box 31

Seldovia, Alaska 99663

ph. 234-7641



Alaskan Wilderness Sailing Safaris

The Quiet of Wilderness Deserves the Silence of Sail

Since 1974

November 20, 1992

Exxon Valdez Oil Spill Trustee Council
645 B Street
Anchorage, AK 99501

Dear Sirs:

Alaskan Wilderness Sailing Safaris supports the testimony submitted by the Alaska Wilderness Recreation and Tourism Association.

We wish to draw special attention to our support of the following projects:

- 1) All habitat identification and acquisition projects
- 2) All projects that will or may restore wildlife that do not include intrusive or lethal measures.
- 3) All projects that will or may restore beach communities without destroying existing ecosystems. We are opposed to the destruction of mussel beds.

We would like to see the following projects added:

- 1) Rewards for information leading to the arrest and conviction of persons harassing marine mammals or wildlife.
- 2) Survey of beaches important to tourism industry for remaining oil and development of a plan to remove it during the 1993 working season. Oil remaining on the beaches has an adverse effect on our charter guests and limits our ability to return to using the areas we visited prior to 1989. The loss of the scenic and wild-

life (intertidal zone, etc.) viewing services provided by the oiled beaches constitutes a continuing adverse effect on our ability to market, deliver a product, and make a living. We have tried advertising ecotourism learning experiences in the oil spill impacted area but have met with considerable consumer resistance. We have tried offering our guests a choice of visiting an area oiled by the spill; most guests consistently choose other locations.

Under U.S. law, the EVOS Restoration funds are the only way we have of recovering the services of natural resources damaged by the spill. There is no way for us to recover our economic losses. Thus, AWSS is disturbed that the criteria used in evaluating projects does not include a category for restoring the services provided by natural resources, such as scenic quality, that were lost.

We are also concerned that the Trustees have very little information on recreation and tourism use of the area and that the economic studies have not yet been released. We ask that the economic studies be released for public review. We propose that the FS as the major landowner consider submitting a request for funding of its own vessel to do surveys, research and monitor recreation and tourism activities in Prince William Sound.

Thank you for the opportunity to comment.

Sincerely,

A handwritten signature in cursive script that reads "Jim Lethcoe".

R. James Lethcoe

Alaska Wilderness Recreation and Tourism Association

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Alaskan Wilderness
Sailing Safaris

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Marcie Baker
Alaska Mountaineering &
Hiking

Gayle Ranney
Fishing & Flying

November 19, 1992

Exxon Valdez Oil Spill Trustee Council
645 G Street
Anchorage, ALASKA 99501

RE: Draft 1993 Work Plan Comments

Dear Sirs:

The Board of Directors for the Alaska Wilderness Recreation and Tourism Association has reviewed the *Exxon Valdez Restoration 1993 Draft Work Plan* and offers the following comments.

A. The Trustee Council should primarily limit 1993 restoration actions to those projects that are time critical, would otherwise be a lost opportunity, or which aid in the restoration of lost natural resources and the services provided by those resources.

Habitat restoration projects such as protection for harbor seal haulout areas, nesting areas, and timber buybacks for habitat and scenic viewshed are the types of projects most beneficial to recreational users and the tourism industry.

AWRTA members are concerned that the agencies who are also the Trustees appear to be using EVOS funds to funding projects which should be funded in the normal course of fulfilling their statutory mandate. The Board also questions whether agencies are the only or even the best groups to be undertaking some of the proposed projects and believe that many of the goals of a project might be better fulfilled through utilizing the resources of the University of Alaska and private contractors.

AWRTA would also like to see more projects solicited from non-agency organizations in the future and all projects listed with a brief description and reasons for the Restoration Team and Chief Scientist's recommendation or non-recommendation. We found the Chief Scientist's comments most useful, especially in cases where we felt he might be lacking in information regarding impacts from the tourism industry. This helped us to focus our comments. However, we are concerned that other projects which did not make it to the Plan stage may have been excluded because the reviewers lacked appropriate information.

B. Are there other projects that should be included? Yes.

1) Develop a rewards program for information leading to the conviction of a person harassing marine mammals or wildlife in the spill impacted area. This would be similar to, but more extensive than, the Sea Lion Reward program recently initiated by the Cordova District Fishermen United. Reducing harassment would help injured species to recover. This would help the recreation and tourism industry recover the use of services provided by natural resources injured by the spill.

2) Develop a comprehensive long-term ecosystem monitoring program to quantify naturally induced changes and to help document the recovery/lack of recovery of species and ecosystem. Baseline information derived from a few years of study does not adequately capture long-term natural fluctuations in the ecosystem. There is currently inadequate information to determine when a species or ecosystem has been restored. Without a plan it is difficult to tell how a particular project fits into the recovery of the entire ecosystem. Scientific reports resulting from a long-term study could be made available to the public and would be very valuable to the recreation and tourism industry in preparing guides, naturalists, and tour boat operators with information to share with their clients.

3) Considerable amounts of tar balls and other spill products remain on beaches used by the recreation and tourism industry in Prince William Sound. A program should be developed to work with recreation and tourism operators to inventory affected beaches and develop a plan to remove the remaining oil. This oil reduces the services provided by the beaches (such as intertidal zone study/observation, scenic quality), has an adverse economic impact on recreational use and tourism, and is an on-going problem that needs to be addressed before another summer tourism season passes.

4) Garbage still remains from the oil spill cleanup on some beaches (raingear, sorbant pads, pompoms, etc.). This has posed a scenic pollution problem and had an adverse impact on local habitat for microtines, etc. We support a program to clean up this oil spill debris and to fund annual cleanups of PWS beaches.

C. Appropriateness of projects, scope, level of funding, and priority.**Priorities/Justification:**

Should definitely be funded = 1

Support funding = 2

Opposed to funding = 3

Priorities/Justification was determined by project meeting one or more of the following justifications.

Priority 1 a) EVOS damaged resource or services provided by it important to recreation and tourism.

b) Project likely to aid the recovery of resources and the services they provide to recreation and tourism.

c) Project essential to an overall restoration framework.

d) Project important for understanding ecosystem, range of long-term natural variations, and evaluating recovery/restoration from EVOS.

Priority 2 a) EVOS damaged resource or services provided by it only marginally important to recreation and tourism.

b) Project of possible use to recovery of resources and the services they provide to recreation and tourism.

c) Project possibly important to an overall restoration framework.

d) Project possibly important for understanding ecosystem, range of long-term natural variations, and evaluating recovery/restoration from EVOS.

Opposed 3 a) Project would or could damage resources or the services provided by those resources that are important to recreation and tourism industry.

b) Not clearly related to the recovery of resources or their services.

Funding recommendations:

N = Project should not be funded.

F = Funding from Restoration funds.

A = Funding from regular agency budgets.

B = Should go out to bid.

Project	Priority	Funding	Comments
93002	1	F-B	Good for sports fishermen; cost might be reduced by open bid
93003	1	F-B	As above
93004	1	F-B	As above
93005	1	F-B	Important for cultural ecotourism; help avoid negative impacts on archeological sites
93006	2	F-B	Could be important for cultural ecotourism
93007	2	F-B	As above
93008	2	F-B	As above
93009	3	N	Not clearly related to restoring either a damaged resource or the services provided by that resource; AWRTA supports funding of a brochure that would describe briefly the injured resources and the way recreational users, tourists, and tour operators could avoid negative impacts on these resources, such as the dates bald eagles or harbor seals are sensitive to disturbance in their nesting/birthing areas. The brochure could inform the public of the rewards for information leading the arrest and conviction of people harassing marine mammals and wildlife in the spill impacted area (Priority #1, funding level up to \$30,000).
93010	1	F-B	Restoration of murre and services provided important to all segments of the recreation and tourism industry.
93011	1	F-B	Significant reductions in the river otter population has occurred in Prince William Sound adversely affecting ability of wilderness guides to show clients river otters.
93012	1	F-B	Good for sports fishermen; cost might be reduced by open bid;
93014	2	A	Only loosely related to EVOS
93015	1	A	Should be funded by ADF&G not out of Restoration funds.
93016			No comment
93017			No comment
93018	3		Not an important sportfishery prior to spill; if ADF&G wants to

develop this fishery, should do so out of agency funds.

- | | | | |
|-------|-----|-------|--|
| 93019 | 3 | N | AWRTA supports villages desire to diversify their economies. However, EVOS funds should not be used for this purpose. |
| 93020 | 3 | N | Not clear how this helps wild mussels to recover. |
| 93022 | 1 | F-B | Restoration of murre and services provided important to all segments of the recreation and tourism industry. |
| 93024 | 3 | A | This is an important sportfishery, but its decline does not appear to be directly related to EVOS. AWRTA supports ADF&G/USFS funding this out of non-EVOS monies. |
| 93025 | 3 | A | This is an important sportfishery, but its decline does not appear to be directly related to EVOS. AWRTA supports ADF&G/USFS funding this out of non-EVOS monies. |
| 93026 | 3 | N | Not in spill area; could adversely affect wild stocks and have a negative impact on sportfishing. |
| 93028 | 3 | N | Watching the progression of naturally induced changes is a major component of ecotourism. Project would have an adverse impact on ecotourism opportunities. |
| 93029 | 3 | N | EVOS funds should not be used to fund pre-commercial thinning. Old growth habitat important to EVOS damaged resources can better be restored through timber purchase. |
| 93030 | 3 | N | Problems with water quality, disease and variety of salmon stocks at hatchery could adversely affect wild stocks in Red Lake. |
| 93031 | 3 | N | Uncertain about possible adverse effects of introducing hatchery stock into wild stock areas. |
| 93032 | 2 | A | Not clearly related to EVOS. |
| 93033 | 3/1 | N/F-B | Important species for bird watching. AWRTA opposes the killing of species for restoration purposes. Support funding for parts of project that are non-intrusive and non-lethal. Colorful Harlequin Ducks are an important species for bird watching and photography. |
| 93034 | 1 | F-B | Important species for bird watching. AWRTA disagrees with Dr. Spies comments: their habitats are threatened by developments within the tourism industry, such as inadvertant disturbance of nesting areas by kayakers, campers, etc. and resulting predation. Identification of habitat and protection of that habitat would help to minimize adverse impacts from recreational users and tourism industry. |
| 93035 | 3 | N | Important species for bird watching. AWRTA opposes the killing of species for restoration purposes. Support funding for parts of project that are non-intrusive and non-lethal. Black oystercatcher habitats are threatened by developments within the tourism industry, such as inadvertant disturbance of nesting areas by kayakers, campers, etc. and resulting predation. Identification of habitat and protection of that habitat would help to minimize adverse impacts from recreational users and tourism industry. AWRTA would support this type of research and restoration. |
| 93036 | 3 | N | Mussel beds are important ecological units in themselves. These beds were left as seed beds to restore mussels removed in the cleanup. The absence of mussels on cliffs and rocks remains a lost resource & service which adversely impacts the marketing, product delivery, and economic condition of tour operators. |
| 93038 | 1 | F | Important project for recreational users and tourism industry. |
| 93039 | 1 | F-B | Important project for recreational users and tourism industry. |

Should be put out to bid or directed to the University of Alaska.

93041 1 F

93042 1 F-B Very high priority project for recreation and tourism industry. Also should be a project to monitor the effects of the spill on transient pods. Project should go out to Bid or be directly channeled to North Gulf Coast Oceanic Society which began the research prior to the spill and has continued it under a contract to NOAA-MMS. Costs to NOAA-MMS for administration could be saved.

93043 1 F-B Very high priority project for recreation and tourism industry. Also should be a project to monitor the effects of the spill on transient pods. Project should go out to Bid or be directly channeled to Chuck Monet (and group) which began the research prior to the spill and has continued it under a contract to DOI-FWS contract. Costs to DOI-FWS for administration could be saved.

93046 1 F Harbor seals are an important megaspecies for all sectors of the tourism industry. Habitat use studies will help ecotourism industry and recreational users to avoid critical habitat areas thus avoiding possible adverse affects on harbor seals and aiding in their recovery. The tourism industry relies heavily on the watchable wildlife services provided by harbor seals and most members of the tourism industry do not voluntarily engage in actions that might be harmful to harbor seals. However, out of ignorance harbor seals can be inadvertantly disturbed during pupping and molting seasons. This research should help to prevent this if the results are made available to the public. We would like to see a component added to the project that includes working with the tourism industry to identify possible areas of conflict and to help tour operators to mitigate this. Should be continued by agencies.

93047 1 F

93050 1 F

93051 2 F Important to sportsfishermen

93053 1 F

93057 1 F

93059 1 F

93060 1 F

93061 1 F

93062 1 F

93063 1 F Important to sportsfishermen

93064 1 F This is probably the one project that would do the most to help recreational users and tourism businesses to recover the services, such as lost scenic quality and wildlife viewing opportunities. AWRTA questions whether sufficient funds have been allocated to purchase the timber rights to an entire watershed. Purchasing timber rights to extend riparian buffer strips would be beneficial to sportsfishermen, but would have no value for restoring scenic quality and very limited, if any, value for restoring wildlife watching opportunities.

93AD 1 F

93RT 1 F

93AD 1 F

93FC 1 F

93 RT 1 F

As the Trustee Council knows, the courts have ruled that the recreation and tourism industry cannot sue oil companies for economic losses resulting from an oil spill. They cannot sue for the loss of the services provided by natural resources damaged by the spill, because the restoration funds are compensation for these services. There is no direct route for recreation and tourism operators who were directly affected by the spill to recover their economic losses. So far, very little attention has been paid to restoring the services provided by natural resources to the recreation and tourism industry. AWRTA requests the Trustees to address this problem.

Respectfully submitted,

A handwritten signature in cursive script, appearing to read "Nancy R. Lethcoe".

Nancy R. Lethcoe

93228197

November 19, 1992
George Covel
Box 984
Cordova, AK 99574

Exxon Valdez Oil Spill
Trustee Council
645 G Street
Anchorage, AK 99501

Gentlemen:

Thank you for the opportunity to review the 1993 Draft Restoration Work Plan--it is a plan in much need of review. The EVOS settlement created a unique opportunity for individual agencies to maintain and build their organizations and to pursue a wide variety of agendas, some of which are unrelated to the oil spill. As residents of Prince William Sound, we are so very fortunate that this opportunity was not abused in the preparation of these proposals.

Seriously though, since I have not had the time to be as involved in EVOS Restoration Planning as I would have liked, I am probably quite naive as to the criteria the Trustees are using to determine a proposal's merit and how well it meets the intent of the settlement. Nevertheless, certain realities regarding the spill, its effects and the settlement are obvious and should form the basis for criteria used in project selection. From the standpoint of one who lives here and is hopeful that the effects of restoration will not be worse than the spill itself, I offer the following:

- Restoration projects should be directed at habitats, species or people directly affected by the oil spill. Project numbers 93003, 93009, 93017, 93036, and 93038 are good examples. Whereas project numbers 93024, 93025, 93032 and others address problems not even remotely related to the spill.
- Restoration projects should have a reasonable chance of achieving meaningful and measurable results. Project 93022 is one of the more notable "shots in the dark".
- Many local populations of birds, fish and mammals were decimated by the oil and will take varying lengths of time to recover. Simply because some local populations have not totally recovered or show signs of a robust recovery is no

reason to declare an emergency and initiate remedial action. This is particularly true of species which have no imperative human uses, such as the Harlequin duck.

- Monitoring and documenting the recovery of the various habitats and species over time is, in general, a more prudent course of action than attempting to "fix" things that will eventually "fix" themselves. The most valuable product of your collective efforts will be knowledge gained rather than one or two more otters, murrelets or harlequins.

The following comments are directed at specific proposals:

- The most glaring omission from the entire plan is anything whatsoever to do with the herring resources of Prince William Sound. I am unaware of the discussions which preceded this decision, but from this perspective, it certainly seems as if our sense of priorities and politics is being misdirected.
- The archaeological related restoration proposals risk accomplishing precisely what they are designed to prevent. The more attention you focus on these resources and sites, the more likely it is that people will visit these areas and remove artifacts. The highlight of humor in the entire plan is contained in proposal 93006. I am sure that somewhere there is a very scientific and deeply thoughtful analysis which produced these estimates, but it would be unwise to release it without a warning label.
- Project 93011 is interesting in that ADF&G proposes to spend \$11,000.00 to make a handful of recommendations.
- I would suggest that within project 93016 we should also provide these people with king crab and razor clams....or maybe filet mignon and lobster. In case anyone overlooked it, I would remind you that Crab Bay has no shortage of salmon. In fact, during the salmon time of year, the bay is commonly plugged with pink salmon returning to the AFK hatchery.
- With the exception of Eshamy Lake, study areas in project 93018 are outside and unrelated to the oil spill area. While the intent appears to be one of fostering good management, using "ORACLE software" and operating in a "MS-DOS environment" probably will not produce any trout or char. I would suggest continued low-level monitoring with parallel development of a management plan for these species.

- Projects 93019 and 93029 propose to subsidize commercial shellfish mariculture programs for native communities in the oil spill area. I cannot imagine that the intent of the settlement included money being spent to put non-native shellfish producers at a competitive disadvantage.

The above critique is offered as an example of both the good and bad in the 1993 Restoration Work Plan. I have neither the time nor inclination to do a project-by-project critique but I urge you, as Trustees of the Settlement, to do so with the aforementioned criteria as guidelines.

As trustees, you have the unenviable task of managing the huge settlement fund along with the huge appetite of an enthusiastic bureaucracy. I am confident that if in your final consideration of these proposals you are able to achieve a reasonable balance in this regard, you will also reasonably meet the intent of the EVOS settlement agreement.

Thank you.

Sincerely,


George Covell

Exxon Valdez Oil Spill Trustee Council
645 G st. #402

Anchorage, AK 99501

re: Draft 1993 Work Plan

Dear EVOS Trustees,

I have just completed a review of the 1993 work plan. There is one factor that immediately grabbed my attention as needing comment. **There is no non-governmental participation.** I have been a direct participant in the oil spill from May 1989 when I was Chief Engineer of a tug towing barges of cleaned up oil, through two State of Alaska jobs (ADEC & ADNR) in both response and restoration until my recent resignation. This is the first time I have observed funding being strictly restricted to government agencies.

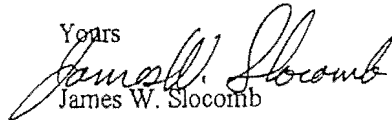
In my experience throughout the response to the oil spill there has been significant private sector participation both inside and outside of government. I find it difficult to believe that all of the private sector technological expertise brought to bear on the response to EVOS has no bearing on or relative to current or future restoration activities. There is no doubt in my mind that the various agencies have significant expertise to bring to the arena. What disturbs me greatly is the appearance of a concerted effort on the part of these agencies to turn the EVOS restoration process into a private bank account managed by the agencies for the agencies. I don't even see any lip service being paid to the concept of public (private sector) participation in the restoration activities or projects. The significant body of scientific and environmental expertise obtained through the various educational, consulting, and engineering firms certainly must have inestimable value to restoration.

I was somewhat astounded to note a couple of other small items; the first is that the chief scientist did not rate any of the proposed projects as contributing directly to restoration. The second is an apparent diversion of restoration money to areas not impacted by the spill; particularly the Fort Richardson Pipeline Project and the Kenai River Salmon Studies/Projects. During my employ as data manager for both ADEC and ADNR oil spill offices I don't remember any EVOS oil in those locations (refer to map on page 9 of the 93 plan). While I can appreciate the value of the proposed projects their funding through EVOS Restoration Funds seems very inappropriate.

The last point I wish to make is that it appears as though there was **never any intent** to allow private sector participation in restoration projects. I am not aware of a published Request For Proposals for projects for the 93 plan. I do not believe that the Memorandum Of Agreement envisioned restoration funds as an alternate source of funding for agency budgets.

In your position of trustee I urge you to take a long hard look at what is happening here and reference that to the Memorandum of Agreement. I think you will find significant discrepancies.

Yours


James W. Slocomb

cc ADN



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Draft 1993 Work Plan Comments

18 November 1992

Exxon Valdez Trustee Council

645 "G" Street

Anchorage, AK 99501

Dear Trustee Council,

I have reviewed the portions of the 1993 Draft Work Plan relating to sea otters (Projects 93043 and 93045). The comments below are limited to those two projects, and do not reflect on the Draft Work Plan as a whole.

Project 93043 is critical to understanding the impacts of the Exxon Valdez oil spill on sea otter population distribution and recovery.

1. Project 93043 (Sea Otter Population Demographics and Habitat Use in Areas Affected by the Exxon Valdez Oil Spill) addresses concerns over persistence of hydrocarbons within the sea otter environment, and their potentially very long-lasting and damaging affects on Prince William Sound sea otter populations. Preliminary studies indicate reduced reproduction and increased mortality among prime-age otters, affects that may be directly related to the Valdez spill. The combination of reduced reproduction and increased mortality paint a serious picture for the long-term viability of the PWS population. Only a focussed study of sea otter demographics over the next several years will give us the picture we need of the long-term affects of oil.

This project could also benefit from an effort to collect tissue samples, whenever possible, for analysis of persistent hydrocarbons. This research could be conducted within the context of on-going USFWS projects (or related projects), and be done under existing permit authority. Tying tissue analyses with demographic studies will give a much broader understanding of the



FRIENDS OF THE
SEA OTTER

long-range affects of oil, and should be considered as part of future funding efforts.

The USFWS has a long and credible sea otter research history. They will conduct the necessary research in a responsibly scientific and timely manner.

We recommend this project proceed as proposed in the Draft Work Plan.

2. Project 93045 (Surveys to Monitor Marine Bird and Sea Otter Populations in Prince William Sound during Summer and Winter) should not include sea otters. Boat surveys of sea otters, in and of themselves, are not accurate enough to justify their cost. However, if the boat surveys could be tied to aerial surveys, and "truthed" against them, the accuracy would improve considerably.

We recommend this project proceed as proposed for marine birds, but exclude sea otters. Boat surveys of sea otters should be included only if appropriate aerial surveys are part of the project.

Comments prepared by:

Ellen Faurot-Daniels
Science and Education Director

93328200

Thomas Stephenson
P.O. Box 280
Cordova, AK 99574

19 November 1992

Draft 1993 Work Plan Comments
Exxon Valdez Trustee Council
645 "G" Street
Anchorage, AK 99501

Dear Trustee Council,

I appreciate the opportunity to comment on the Draft 1993 Work Plan.

I am confused by the statements of the Chief Scientist in his evaluation of the proposed Bald Eagle project, # 93052. I believe that the Chief Scientist has missed the point of this project and does not understand its value.

Dr. Spies comment on the bald eagle study in the 1993 Draft Work Plan reads: "Bald eagles were injured by the spill, but this could not be detected in the population surveys. Since we have no way of measuring recovery of this species restoration action seems inappropriate". I do not believe that the ability to document recovery is a prerequisite for restoration projects. If it were, there would be very few projects up for consideration. The proposed project aims to identify and protect bald eagle habitats from further degradation and damage. This is totally appropriate, and fits the definition of Restoration well.

Further, in a letter to the Trustee Council on page 1 (back of 1993 Draft Work Plan), Dr. Spies indicates that "...restoration funds should be used for one of the following [4] purposes:", which include "supplement natural recovery processes or prevent further degradation of habitat that could negatively influence recovery of injured resources". That describes the bald eagle project exactly. The proposed project may save more eagles than died in the oil spill itself! Many of the areas slated for logging contain some of the highest densities of bald eagle nests anywhere in North America. Given the aggressive schedule for logging in Prince William Sound, we should not wait to implement the work.

Project #93052 is currently under-rated. This project has obvious merit and should be given high priority. The comments by the Chief Scientist are unfounded.

Sincerely,



Thomas Stephenson

Copper River/Prince William Sound Advisory Committee

P.O. Box 1558 • Cordova, Alaska 99574

November 20, 1992

Exxon Valdez Oil Spill
Trustee Council
645 G Street
Anchorage, AK 99501

Gentlemen:

Thank you for the opportunity to review the EVOS 1993 Draft Work Plan. It is clear from a review of this document that completion of the Restoration Plan as soon as possible will provide the necessary guidance to prioritize projects and expenditures authorized by the settlement. It is our belief that the Plan should contain a more focused set of criteria which would clearly tie restoration activities to injury caused by the spill. Many of the proposals contained in the 1993 Draft Plan are not even remotely related to EVOS damages.


As a general approach, we believe that initial restoration activities should consist largely of monitoring of those resources directly injured by the oil spill. If opportunities for remedial action are identified through this monitoring program, and it is determined that remedial action will achieve meaningful and measurable results, these activities should then be considered. Many of the proposals in the 1993 Plan do not meet this test.

We are disappointed that the 1993 Plan does not include any further monitoring of injuries to the herring resource of Prince William Sound. At least one age class of herring was shown to be injured during the NRDA studies. When prioritizing these projects, we urge you to acknowledge the importance of herring to the communities of the oil spill area.

Our Advisory Committee will meet again in February 1993. This meeting will be a good opportunity to discuss revisions to the 1993 Draft Plan and the Restoration Plan. Please contact us if you wish to attend or require additional comments or information.

Thank you.

Sincerely,



George Covey, Chair
Prince William Sound
Advisory Committee

United States
Department of
Agriculture

Forest
Service

Pacific Northwest
Research Station/
Alaska Region

75528202
Copper River Delta Institute
612 2nd Street
P.O. Box 1460
Cordova, Alaska 99574
907/424-7212
FAX 907/424-7214

Reply: 1500

Date: 18 November 1992

Subject: Comments on Draft 1993 EVOS Work Plan

To: Exxon Valdez Trustee Council

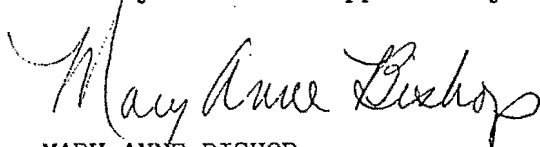
I wanted to comment on the Draft 1993 Work Plan, with regards to the proposed project #93052, "Identification and Protection of Important Bald Eagle Habitats."

In the Draft 1993 Work Plan, this study is rated as a "Project receiving less Restoration Team Support." The only evaluation of Project #93052 is on page 8 of the recommendation by Dr. Spies to the Trustee Council, dated 22 September 1992 (pages 248-256 in the Work Plan). Dr. Spies comments read "Bald eagles were injured by the spill, but this could not be detected in the population surveys. Since we have no way of measuring recovery of this species restoration action seems inappropriate."

However, in the same letter, Dr. Spies indicates that "restoration funds should be used for one of the following (4) purposes:"....."#3. supplement natural recovery processes or prevent further degradation of habitat that could negatively influence recovery of injured resources."

Given that this proposed project aims to identify and protect bald eagle habitats from further degradation and damage, it seems that this project is appropriate and fits the intended use of Restoration Funds. Currently, many of the areas slated for logging in Prince William Sound contain some of the highest densities of bald eagle nests anywhere in North America (approximately 1 occupied eagle nest/shoreline mile). Because of the imminent threat to bald eagle habitat, this project has important merit and should be given a high priority for funding in 1993. Furthermore, the previous investment (several hundred thousand dollars) in radio-tagging eagles provides yet another justification for continued monitoring of this injured species.

Thank you for the opportunity to comment.



MARY ANNE BISHOP,
Acting Manager
Copper River Delta Institute

93328203



Nov. 20, 1992

Exxon Valdez Trustee Council
645 G Street
Anchorage AK 99501

SUBJECT: Chugach Alaska Corporation Comments On the Draft 1993 Work Plan

Dear Members of the Trustee Council:

Chugach Alaska Corporation offers the following comments in response to the solicitation for comments on the Draft 1993 Work Plan. Chugach Alaska Corporation is the regional corporation formed under the Alaska Native Claims Settlement Act for the Chugach region. Its land and its people were the first and most severely impacted by the Exxon Valdez spill. Chugach's shareholders total 2,027 of whom over 55 per cent are at large, meaning they are not represented by a village corporation.

Chugach Alaska Corporation manages property on behalf of its shareholders. It is responsible for the subsurface rights on roughly 650,000 acres of village corporation property and for both surface and subsurface rights to 350,000 acres of CAC property.

Chugach Alaska Corporation and its constituents have been commenting on the spill and its impacts since March 24, 1989. To limit our perspective for comments to the Draft 1993 work plan is no small feat. Yet we realize and appreciate the task at hand. Our comments will be offered in three categories: general comments on the plan and the process; comments on specific projects contained in the draft 1993 plan; and a suggestion for a new project designed to maximize the involvement of the Chugach people in the oil spill restoration effort.

General comments

Our general comments will respond first to the specific questions posed in the Draft 1993 Work Plan. In anticipation of the Restoration Plan being completed in 1993, CAC recommends that the Trustees resist the tendency to implement a large-scale restoration program prior to the completion of the Restoration Plan. Our shareholders are not convinced that the proposals which have been submitted for comment promise significant progress toward restoration. In many instances we feel disposed to resist more biological studies until social and human injury resulting from resource and service impacts are considered with emphasis equal to that given biological injury.

Comments on the Draft 1993 Work Plan - Page 2
Nov. 20, 1992

In the area of cultural and archeological service impacts we perceive no reason to wait for further evidence or for the complete Restoration Plan. In fact we consider projects proposed to address these issues critical.

Absent review of individual projects with the proposing or lead agencies, we find it fairly difficult to comment at length about specific proposals except those in the cultural/archeological realm where Chugach Alaska Corporation has expertise resident in its Chugach Heritage Foundation.

The final area of questions posed in the Draft 1993 Work Plan requests the priorities of the commenting party with regard to proposed projects and additional recommended projects. This is an extremely important area to the Chugach people.

Primarily the Chugach people feel that the restoration of the resources and services injured by the spill should address the social, cultural and civic injury insofar as the injury diminished the ability of the region's residents to conduct their lives in their traditional manner. Further, due to the impact of the spill and the cleanup effort, it is impossible to return to the pre-spill state. Hence, additional efforts should be made to mend the social fabric rent by the spill and cleanup exercise. These efforts should not be limited to attempts to return to some prior state but should seek expansive means of improving the lives and cultural linkage of the communities in the region.

We would encourage the Trustees to consider community development projects that would ease the daily lives of the residents of Chugach region communities and help them in their efforts to perpetuate their culture. Consideration, comparison and selection of certain of such community projects will not restore any resources impacted by the spill but so doing would ameliorate negative impacts which the spill and cleanup have had on the villages and their residents.

Chugach sincerely hopes that the Trustees recognize the importance of maximizing CAC involvement in restoration projects which affect cultural resources in the Chugach Region. CAC has had an active cultural resource program for the past decade, working closely with state and federal agencies in promoting, researching and protecting the cultural heritage of the Chugach people. The oil spill and the cleanup effort have resulted in our cultural resources being put in immediate and irreparable jeopardy. The only realistic amelioration will occur through public education, monitoring of sites and enforcing laws and by enhancing resident interest and participation in cultural preservation programs.

Under the following section we will present our comments on the specific proposed cultural resources projects. In general, we wish to communicate our policy of withholding support for projects affecting CAC cultural resources which fail to allow for substantial Chugach participation. In this context, Chugach gives only conditional

Comments on the Draft 1993 Work Plan - Page 3
Nov. 20, 1992

support to the restoration projects listed later.

Project Comments

Chugach Alaska Corporation is proposing to manage and direct the excavations on our certified 14(h)(1) historical selections and other archeological sites within the region under Project 93006, "Site Specific Archeological Restoration." Due to the sensitivity of Native burial/village sites that have been impacted, it is felt that Chugach Alaska Corporation must direct and administer these proposed projects.

Project 93007, "Archeological Site Stewardship Program," should be managed by Chugach and operated with assistance from concerned local Natives with oversight by state and federal agencies. A large portion of these archeological sites are either owned or selected by Chugach; considering ownership or pending ownership and the cultural connection, it is felt Chugach should have the opportunity to manage and protect its cultural resources.

Therefore Chugach endorses projects 93006 and 93007 provided that CAC is extended the opportunity to conduct and administer the archeological excavation and protection programs. Direct control over their cultural resources is a critical issue to the Chugach people. These sites are considered the special jurisdiction of the Chugach people; those sites on Native selected or conveyed lands are increasingly sensitive. Further, any archeological restoration of uplands and intertidal sites should be coordinated with Chugach Alaska Corporation and the Chugach Heritage Foundation. John F.C. Johnson, Cultural Resource Manager for CAC, is personally familiar with the sites and their import. His sister, Lora Johnson, who is working for CAC, possesses a doctorate in archeology and is engaged in various Alaska archeological projects.

Project 93008, "Archeological Site Patrol and Monitoring," will call extensively on the resources of the village residents. Chugach should be directly involved in managing and administering this project and village public safety officers should be included in any law enforcement programs to heighten awareness of the importance of archeological resources for village residents as well as visitors.

The preferred method of cooperative participation from Chugach's viewpoint would be a cooperative agreement with involved agencies which would include Chugach in the planning and management of the projects as well as the field work. The region feels a need for direct involvement of its shareholders. Further, in recent communications (Nov. 18) with Chugach National Forest staff, Chugach was assured its contracting concerns could be met. Proper funding levels should include salaries for village participants and CAC as well as agency staff. A special fund to permit transportation to remote survey sites should be included.

Chugach Resource Management Agency

With these comments you will find a copy of a new project proposal, recommending - creation of a Chugach Resource Management Agency. Chugach Alaska Corporation proposes to form the CRMA under a cooperative agreement with one or more federal or state agencies desirous of gaining access to dependable human, property, facility and technical resources within the Chugach region.

The CRMA project proposal was drafted in direct response to expressions of interest by federal and state agency representatives who were familiar with the difficulties of managing projects in the spill area without a thorough knowledge of the resources available in the field. Under the CRMA proposal, resources would be inventoried and referrals made to agencies initiating projects to insure that physical impacts were minimized and that financial resources were expended efficiently.

While Chugach is proposing the project and would manage it, the village corporations and councils as well as the regional non-profit, Chugachmiut, would be involved in the development of the resource inventory and the coordination of project requirements and resources as they saw fit to participate. Chugach expects that the services of the CRMA would be valuable in future years' restoration efforts and that it would be an annual project for inclusion in the yearly work plans.

Summary

Chugach Alaska Corporation appreciates the interest the Trustees and the state and federal agencies which support the restoration effort have expressed in the views of the corporation and its shareholders. It is the intention of Chugach Alaska Corporation to maintain an active involvement in the restoration process for the duration. Further, it is the expectation of Chugach and its shareholders that the Trustees will consider the special concerns of the residents of the region and address restoration efforts toward the communities and individuals who experienced wholesale lifestyle dislocation as a result of the oil spill and cleanup efforts.

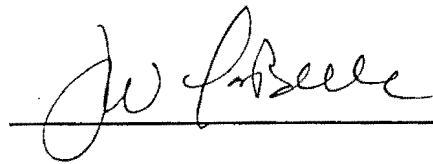
The benefits of community development projects or of putting the people of the region to work to the maximum degree possible in all restoration efforts would compare quite favorably with the restoration effectiveness of the myriad studies which have been proposed. Suspending the obvious biological bias of the effort to date and seeking means of addressing social and human resource impacts immediately would indicate a level of realism and responsibility which to date has not been shown to, or at least perceived by, the people of the region.

Certainly Chugach feels there should be no funding for projects which would have, could have or should have been funded by agency budgets irrespective of the spill.

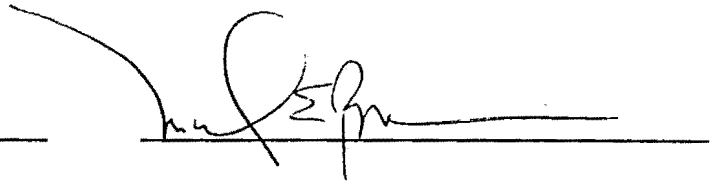
Comments on the Draft 1993 Work Plan - Page 5
Nov. 20, 1992

We are hopeful that the process of making these comments will be the beginning of a healthy and productive dialog between Chugach Alaska Corporation and its shareholders and the Trustees and the agencies which support them with the goal of restoring a broader spectrum of resources than has been included in the work plans to date.

Sincerely,

A handwritten signature in cursive script, appearing to read "J W LaBelle", written over a horizontal line.

James W. LaBelle
Chairman, Board of Directors
Chugach Alaska Corporation

A handwritten signature in cursive script, appearing to read "Michael E. Brown", written over a horizontal line.

Michael E. Brown
President
Chugach Alaska Corporation

EXXON VALDEZ OIL SPILL PROJECT DESCRIPTION

Project Number:

Project Title: Chugach Resource Management Agency

Project Category: Implementation Planning and Management Action

Project Type:

Lead Agency:

Cooperating Agencies: U. S. Forest Service, U.S. Fish and Wildlife Service, National Park Service, Alaska Departments of Law, Natural Resources, Fish and Game and Environmental Conservation.

Project term: Jan. 1, 1993-Dec. 31, 2001 (Balance of restoration effort)

INTRODUCTION

A. Background on the Resource/Service and Summary of Injury

The natural resources and associated services of the Chugach region have experienced significant injury as a result of the **EXXON VALDEZ** oil spill. The extent of injury is still under investigation. Various proposals for restoration have been proposed and funded which anticipate positive impacts on the affected resources and services.

The process of restoration of resources and services in the oil spill area has been and will continue to be a major effort resulting in significant additional impacts on the resources and services of the region. The impacts can be minimized and the benefits to the region resulting from restoration activities enhanced if the agencies engaged in project management utilize to the maximum extent possible resources available within the oil spill area and particularly within the Chugach region.

The full inventory of impacted resources and services within the Chugach region will be addressed in the course of this project as specific restoration projects are initiated and executed.

B. Location

The organization formed to provide resource management services to the restoration projects will operate primarily within the Chugach Region but will be available to provide services in other oil spill impact areas or in other locations where restoration projects are proposed.

WHAT

A. Goal

The goal of this project is to optimize the efficiency of the restoration projects and minimize their

physical impacts by using local resources in performance of project tasks.

B. Objectives

1. Reduce the physical impact of restoration projects by utilizing locally available human resources, facilities, equipment and services in conducting restoration projects.
2. Derive greater financial benefit from restoration funds by utilizing resources available within the region, eliminating distant acquisition and transportation.
3. Coordinate assignment of local resources in order to optimize use of services in the field without redundancy or unnecessary impact due to duplicative logistics or personnel movements.
4. Acquaint residents of the heavily oiled areas of the Chugach region with the techniques of oil spill restoration to insure the availability of a trained workforce for future years' restoration efforts.
5. In the remaining years of the restoration effort familiarize residents of the region with sensitive areas and resources.
6. Heighten the awareness of Chugach region residents to the signs of and steps to follow in the event of future oil injury discovery or in the event of future spills.
7. In instances where restoration projects address sensitive subjects of cultural importance to the Chugach people, confine knowledge of and exposure to sensitive issues and materials to those people whose very culture was disrupted by the spill and cleanup.

WHY

A. Benefit to Injured Resources/Services

Utilization of the Chugach Resource Management Agency will generate benefit to injured resources and services by increasing the efficiency of service delivery in the area of each restoration project within the region. This efficiency will be experienced on all projects in cost savings, reduced logistics and manpower transportation time and in use of local knowledge.

B. Relationship to Restoration Goals

Individual projects which fulfill restoration goals will be aided in that effort by resource optimization as a result of using the Chugach Resource Management Agency. To the extent that the individual projects fulfill restoration goals, incremental goal fulfillment advances will be achieved. Minimizing the impact of the individual restoration projects will be the result of using locally available human resources and equipment.

HOW

A. Methodology

This project will be organized by Chugach Alaska Corporation in the following sequence of events:

1. Contact state and federal agencies serving as lead agency for restoration projects within the Chugach region.
2. Jointly define project requirements in terms of locally available resources or subcontractors.
3. Form the Chugach Resource Management Agency team which shall be composed of specialists from each village corporation, village council and association and from the regional non-profit, Chugachmiut as they choose to participate in the CRMA effort.
4. In concert with the regional non-profit corporation and the assorted village corporations and councils, prepare a detailed inventory of the available resources in each community with respect to manpower, contract services, technical expertise, equipment and other matters of interest to the state and federal agencies.
5. Serve as a regional resource clearinghouse in aiding lead agencies in arrangements for services in the restoration project areas.
6. In concert with the CRMA team, develop new restoration project proposals for the Chugach region.
7. Contract for training, management and other specialized services with state and federal agencies seeking contractors to conduct restoration activities in the region.

B. Coordination with other efforts

Coordination of oil spill restoration efforts is a key objective of the Chugach Resource Management Agency. Coordinated assignment of manpower, services, equipment and related logistics will minimize cost to the lead agencies and to the restoration effort overall.

ENVIRONMENTAL COMPLIANCE

Environmental compliance is addressed in each project summary.

Project Number:

WHEN

Chugach Resource Management Agency Schedule

STEP NO.	DESCRIPTION	BEGIN DATE	FINISH DATE
1	Contact state and federal lead agencies to gain full understanding of proposed restoration projects	1 Jan. 1993	1 April 1993
2	Form CRMA team utilizing specialists from organizations as they see fit	15 Jan. 1993	1 March 1993
3	Prepare detailed project requirements in terms of potentially local resources	10 Feb. 1992	1 May 1993
4	Prepare detailed resource inventory for each village and for the region	1 Jan. 1993	1 June 1993
5	Aid lead agencies in identifying firms and individuals to provide contract services	2 March 1993	1 July 1993
6	In concert with the CRMA team, develop new restoration project proposals for the Chugach region	2 March 1993	30 Sept 1993
7	Contract for training, management and other specialized services with state and federal agencies	1 June 1993	31 Dec 1992

Note: Steps, descriptions, begin and finish dates apply to 1993 work plan projects only.

BUDGET

The budget for the Chugach Resource Management Agency is estimated at \$408,000 prior to any contracts for direct service delivery to agencies or projects. Additional sums would be due the CRMA if specific project services were contracted by state or federal agencies.

Personnel	\$	213,000
Travel		77,000
Contractual		63,000
Equipment		94,000
Subtotal	\$	447,000

General administration (15%)		67,050
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Project total	\$	514,050
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COMMENTS

You are invited to share your ideas and comments with the Trustees.

Please use this tear sheet to present your views on the 1993 Draft Work Plan.

You may send additional comments by letter regarding the 1993 Draft Work Plan.

The Draft Plan for The Exxon Valdez Restoration is ~~too~~ too heavily slanted toward monitoring and research, neglecting the most important use of the money which is habitat protection.

While it is certainly true that some research should be done, I am appalled by some of the ridiculous proposals. One that I think should be deleted is Project # 93022 which would put dummy murre on cliffs in The Barrenes. These birds will most likely, over time, recolonize on their own without a \$280,000 project to entice them. That \$280,000 would be much better spent on ~~fox~~ fox removal efforts in the maritime refuge. Certainly some of the murre killed in the spill could have been migrating to colonies further out perhaps off The Alaska Peninsula or The Aleutians. Removing foxes is probably one of the foremost mitigation activities that money could be spent on. I urge you to delete this silly project and redirect the money to fox removal.

a larger portion of the funds, 60-70% should be allocated to habitat ~~restoration~~ protection. Purchasing timber rights, buying park lands

If needed, use the space on the back or attach additional sheets. Please

fold, staple, and add a postage stamp. Thank you for your interest and participation.

Additional Comments:

such as Kachemak Bay State Park or Kenai Fjords National Park would preserve rich coastal fisheries and adjacent resting areas for waterfowl.

Please consider adjusting the money allocations and eliminate wasteful projects like the one I mentioned.

Thank you.

Nina Faust

----- (fold here) ----- Return Address:

Nina Faust
P.O. Box 2994
Horner, AK. 99603

Rec'd
11/23



Exxon Valdez Oil Spill Trustee Council
645 G Street
Anchorage, AK 99501

Attn: 1993 Draft Work Plan

93325205

Pacific Seabird Group



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

Craig S. Harrison
Vice Chairman for Conservation
4001 North 9th Street #1801
Arlington, Virginia 22203

November 20, 1992

BY FAX (hard copy to follow)

Dr. David R. Gibbons
Exxon Valdez Oil Trustee Council
645 G Street
Anchorage, Alaska 99501

Re: Comments on Draft 1993 Work Plan

Dear Dr. Gibbons:

This letter contains the Pacific Seabird Group's (PSG) comments on the draft 1993 Work Plan. PSG is an international organization that was founded in 1972 to promote knowledge, study and conservation of Pacific seabirds. PSG draws its members from the entire Pacific Basin, and includes biologists who have research interests in Pacific seabirds, state and federal officials who manage seabird refuges and individuals with interests in marine conservation. PSG has hosted symposia on the biology and management of virtually every seabird species that the Exxon Valdez oil spill affected. This letter has been approved by PSG's Conservation Committee and senior members of its Executive Council.

PSG is disappointed that the Trustees propose to spend \$38 million on restoration activities during 1993 that will have little tangible benefit to seabirds. While we are impressed with the quality of parts of the work plan, some proposals do not meet the high standards that we expect. In June we noted that the \$1 billion trust fund must be spent wisely if the immense job of restoration is to be accomplished. We find little wisdom with respect to seabirds in the 1993 Work Plan.

We have previously observed that the best means to restore Alaska's seabird populations would be the removal of rats, foxes and other alien creatures from colonies and former colonies. PSG's June 3, 1992 comments addressed the draft Restoration Framework and the Trustees' request for suggestions for the 1993 Work Plan. We recognize that

establishing a new infrastructure to restore the marine resources has been a difficult and demanding task. Nevertheless, we want to be assured that PSG's input during the past two years has not been ignored. The 1993 Work Plan does not include our key suggestion — funds to eliminate foxes, rats and other predators from present and former seabird colonies. In addition to alcids and larids, predator removal would help the entire bird community to — recover, including island-nesting sea ducks, dabbling ducks, oystercatchers and wintering waterfowl. The Canadian Wildlife Service will soon use funds from the Nestucca oil spill to restore seabird habitat in the Queen Charlotte Archipelago, British Columbia, by removing introduced rats and raccoons.

PSG has previously submitted a list of islands where foxes should be removed. The following islands are those closest to the oil spill area depicted in the 1993 Work Plan and perhaps easiest for the Trustees to justify at this time: Chernabura, Simeonof and Little Koniuji (Shumagin Islands) and Elma and Inikla Islands (Sandman Reefs). Most birds killed in the spill are migratory. Based on finding oiled seabirds in the Pribilof Islands during 1989, seabirds from the Shumagin and Aleutian Islands were probably oiled. Moreover, ground squirrels should be removed from Kak Island (near the Semidis) where they may be harming Ancient Murrelets. While Kak Island is outside the map of the spill area, it is small and rodent elimination is feasible. Methods developed there could be used at other larger islands within the spill area that have exotic rodents. We request that the Trustees ask the U.S. Fish & Wildlife Service to submit for public review and comment a multi-year plan that outlines a comprehensive approach to removing all exotic predators from seabird islands in Alaska. Such a plan should identify the methods by which such predators would be removed and include realistic milestones that would allow completion of the task within five years.

We are concerned that the Trustees are spending too much money on overhead and projects that do not directly restore natural resources. We ask the Trustees to address our suggestion that non-governmental organizations have an opportunity to propose projects without using a "middle man" agency that expends an undisclosed but probably large amount of funds for overhead. Such an approach will enable the greatest restoration of natural resources. Currently, the Trustees seem to be applying an agency pork barrel approach. PSG might be interested in adopting the Alaska Maritime National Wildlife Refuge and applying for funds to remove predators, but there is no mechanism to do so.

While we normally use our expertise to focus our comments on seabird restoration, we question the basis for studies of cultural resources (93005; \$400K), public education (93009; \$317K) and subsistence foods (93017; \$360K). These projects are probably valuable, but do not seem to restore any natural resources that the oil spill damaged.

The Trustees have documented that the spill killed as many as 645,000 seabirds for which five seabird projects are funded at a cost of \$1,535,000 (out of \$38,000,000) in 1993. We think seabirds suffered more than 4 percent of the harm to Alaska's natural resources. PSG could not justify any of the Trustees' projects ahead of the removal of introduced predators from seabird colonies. Nevertheless, we endorse the following projects:

3

Harlequin Duck Restoration (93033; \$718K)
Pigeon Guillemot Recovery (93034; \$166K)
Black Oystercatchers/Oiled Mussel Beds (93035; \$108K)
Marine Bird/Sea Otter Surveys (93045; \$262K)
Bald Eagle Habitat (93052; \$188K).

The \$718,000 in the Harlequin Duck project could restore more Harlequin Ducks if it were devoted to protecting habitat in such areas as Kachemak Bay State Park, Afognak Island and other areas scheduled to be logged.

PSG is surprised that the Trustees included a project to enhance murre productivity by using decoys or recorded calls at colonies (93022; \$281K). In June we expressed our objections concerning this project and doubt that these techniques will improve murre populations in Alaska. Any minor success attributed to these unproven techniques cannot be justified under the cost/benefit analysis in the Trustees' restoration criteria. We know of a similar project at Kilauea Point, Hawaii, at a Laysan albatross colony that was deemed a failure by the U.S. Fish & Wildlife Service in the 1980s. Murres were hit very hard by the spill and have undergone continued "mortality" due to breeding failures since the spill. As part of any decoy study, it is essential that any "natural recovery" be documented by censusing and monitoring breeding attempts throughout the spill area. Any improvement that may be seen in decoy areas must be proven to be above natural recovery to warrant any conclusion that seabirds were restored or to justify its further use for this or other spills.

PSG supports habitat acquisition. Because protecting habitat will benefit seabirds and all other wildlife species, protect commercial and sport fishing and recreation, we support the habitat acquisition projects (93061; \$535K & 93064; \$20 million). PSG supports areas identified in Alaska State Legislature bill HB411, which has had broad public comment, review and support. We have identified in earlier correspondence several private seabird islands that should be acquired. Because land acquisition can be extremely expensive, the Trustees should use conservation easements instead of outright purchase whenever feasible.

PSG will sponsor technical sessions on damage assessments and restoration of seabirds following the Exxon Valdez oil spill at its annual meeting in Seattle from February 9-13, 1993. We invite the principal investigators of seabird projects to present papers on their proposed studies and encourage the Trustees and their chief scientist to attend this meeting and discuss seabird restoration.

In conclusion, PSG once again urges the Trustees (1) to fund the only project that is certain to increase the populations of the twenty or so seabird species injured by the oil spill, namely, the removal of predators from colonies; and (2) to protect habitat under imminent threat as soon as possible to halt further losses.

Sincerely,

Craig S. Harrison

93329206

TATITLEK VILLAGE IRA COUNCIL

P.O. Box 171
Tatitlek, AK 99677

Ph. (907) 325-2311
FAX (907) 325-2298

RESOLUTION NO. 92-31

A RESOLUTION OF THE TATITLEK VILLAGE IRA COUNCIL IN SUPPORT OF FUNDING OF THE CHUGACH REGION MARICULTURE PROJECT (93019) AND THE BIVALVE SHELLFISH HATCHERY & RESEARCH CENTER (93020) BY THE EXXON VALDEZ OIL SPILL SETTLEMENT TRUSTEE COUNCIL UTILIZING OIL SPILL RESTORATION FUNDS.

WHEREAS: the Tatitlek Village IRA Council is the recognized governing body of the Native Village of Tatitlek; and

WHEREAS: the Village of Tatitlek is located in Prince William Sound, just four miles from Bligh Reef, where the Exxon Valdez Oil Spill of March 24, 1989 occurred; and

WHEREAS: the Exxon Valdez Oil Spill has severely impacted the lifestyles of residents of the Village of Tatitlek both culturally and economically through its damages to the many resources that have been damaged by the oil spill; and

WHEREAS: Restoration of areas and resources damaged by the oil spill is being funded through the Exxon Valdez Oil Spill Settlement Trustee Council; and

WHEREAS: funding of a Chugach Region Mariculture Project (93019) and the Bivalve Shellfish Hatchery & Research Center (93020), which would ensure the long term success of the Tatitlek Mariculture Project to provide long term employment opportunities for Tatitlek residents and provide an alternate subsistence resource for resources damaged by the oil spill has been proposed.

NOW THEREFORE BE IT RESOLVED THAT: the Tatitlek Village IRA Council urges the support of the Chugach Region Mariculture Project and the Bivalve Shellfish Hatchery & Research Center by the Exxon Valdez Oil Spill Settlement Trustee Council;

BE IT FURTHER RESOLVED THAT the Tatitlek Village IRA Council is supportive of the Subsistence Restoration Project (93017), the Habitat Use, Behavior, & Monitoring of Harbor Seals in Prince William Sound (93046) and the Chenega Chinook & Coho Salmon Release Program (93016) and urges the funding of these projects.

PASSED AND APPROVED BY THE TATITLEK VILLAGE IRA COUNCIL AT A DULY CALLED MEETING HELD ON NOVEMBER 10, 1992, BY A VOTE OF 5 FOR AND 0 AGAINST, WITH 0 ABSTENTIONS.

SIGNED:



Gary P. Kompkoff, President

DATE:

11/10/92

ATTEST:



November 20, 1992

Draft 1993 Work Plan Comments
Exxon Valdez Trustee Council
645 G Street
Anchorage, Alaska 99501

Re: 1993 Draft Work Plan

Members of the Exxon Valdez Trustee Council:

We have received and had an opportunity to review the 1993 Draft Work Plan for restoration of the Exxon Valdez oil spill. On behalf of the World Wildlife Fund ("WWF"), an international conservation organization with over one million members, I would like to offer the following comments on the restoration projects that are proposed to be undertaken in 1993 by the Exxon Valdez Trustee Council.

The Exxon Valdez oil spill affected portions of Prince William Sound, Cook Inlet, and the Shelikof Strait, including prime wildlife habitat in and around the Kodiak National Wildlife Refuge. See Figure 1. On a seasonal basis, brown bears forage in the intertidal and supratidal areas of the Kodiak Archipelago. In addition to exposing brown bears to petroleum hydrocarbons, the spill affected salmon runs, a prime source of food for many Kodiak bears during the summer months. Although the full extent of the impact of the spill on salmon runs on Kodiak and elsewhere is not yet known, the Draft Work Plan indicates that following the spill, mortality rates of pink salmon eggs increased and that 1990 returns of pink salmon, which were exposed to the oil as larvae, may have decreased in some areas by as much as 25%.¹ In addition, limits on commercial harvests of adult sockeye salmon, imposed in 1989 as a result of the spill in portions of Cook

¹ Although these impacts were apparently documented in Prince William Sound, the 1993 Draft Work Plan suggests that similar impacts on pink salmon eggs and fry may have occurred in other areas affected by the spill, including waters near Afognak Island, adjacent to Kodiak Island. 1993 Draft Work Plan at 138-141.



Exxon Valdez Trustee Council
November 20, 1992
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Inlet, Chignik, and Kodiak, have resulted in lower than normal survival rates for smolt, threatening future returns of adult salmon.²

As indicated in our letter to Dr. Gibbons, Interim Administrative Director of the Exxon Valdez Oil Spill Restoration Team, dated June 8, 1992, WWF strongly recommends that the vast majority of the Council's restoration work focus on the acquisition of prime fish and wildlife habitat in Prince William Sound and the Gulf of Alaska, in particular within the Kodiak National Wildlife Refuge. Acquisition of lands within the Kodiak Refuge will provide long-term benefits for a wide range of fish and wildlife species, including brown bears that may have been directly or indirectly affected by the spill. In addition, it will ensure that lands lying within the Refuge boundary, now owned by Native Corporations, are not sold off or developed in response to increasing financial pressures on those corporations.

Unfortunately, although the report includes a number of projects aimed at habitat protection planning and acquisition, which we generally support, it does not identify specific parcels to be acquired. Moreover, it indicates that only lands within the area affected by the spill which contain critical habitats necessary for the recovery of natural resources and services injured by the spill which face an "imminent threat"³ will be candidates for acquisition prior to completion and implementation of the Restoration Planning process.

We recognize that the public has nominated numerous parcels as potential candidates for acquisition and that a systematic process is needed to identify those parcels most worthy of protection. Lands selected by Native Corporations within the

² 1993 Draft Work Plan at 239-240. In an attempt to restore the commercial fishery in Red Lake, located on the southwest side of Kodiak Island, the Draft Work Plan includes a project to release cultured fry into the Lake. Although this is designed to restore sockeye salmon production in future years, the report indicates that returns of adult salmon in 1993 and 1994 are expected to be so low that minimum spawning populations will not be achieved. Project 93030 at 130-133.

³ An "imminent threat" is defined as "a change in land use which (1) is likely to foreclose restoration options, and (2) can reasonably be expected to occur before adoption and implementation of the Restoration Plan". 1993 Draft Work Plan at 208.

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November 20, 1992
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Kodiak National Wildlife Refuge, however, contain some of the most valuable and productive wildlife habitat in the archipelago. In addition to the Kodiak brown bear, Kodiak and surrounding areas provide valuable habitat for anadromous fish, several species of marine mammals, terrestrial mammals such as red fox and deer, as well as bald eagles, abundant waterfowl, and more than one million winter sea birds.

Furthermore, it is clear that the threat of development is "imminent" and ever increasing. Land rich and cash poor, the Native Corporations that own critical parcels within the refuge's boundary, are under increasing financial pressure to sell off or develop their inholdings. For example, the Koniag Regional Corporation previously transferred numerous 10 acre parcels on the Larson Bay side of the refuge to its shareholders. In addition to complicating future land acquisition efforts by the U.S. Fish and Wildlife Service, it is our understanding that owners of as many as 194 of those parcels have now received notice that their property taxes are overdue, raising the distinct possibility that those properties could be sold to third parties at a tax auction. Other examples of increasing development pressure on the refuge include the construction of rental cabins in prime bear habitat at Karluk Lake without the prior approval of the Fish and Wildlife Service as well as negotiations by the Akhiok-Kaguyak Native Corporation with an air charter service to construct a permanent air strip and lodge along the lower Ayakulik River.⁴

In conclusion, acquisition of lands within the Kodiak National Wildlife Refuge, now owned by Native Corporations, represents a unique opportunity for the Exxon Valdez Trustee Council to not only redress spill-related impacts on the region's fish and wildlife but to prevent future development of a unique resource that is under imminent and ever increasing threat of development.

⁴ For a more complete discussion of potential long-term threats to the Refuge, see The LTN Group, Kodiak Brown Bear Research and Habitat Maintenance Trust Analysis of Program Options and Priorities at 26-29 (1992). In this context, it is worth noting that this report concludes that the Kodiak Brown Bear Research and Habitat Maintenance Trust, established pursuant to a settlement agreement in 1981 as mitigation for the Terror Lake Hydroelectric Project, should attempt to take advantage of oil spill settlement funds for protection of Kodiak brown bear habitat. Funds could be used for fee title acquisition, purchase of conservation easements, or acquisition of development rights. The LTN Group at 38, 45.

Exxon Valdez Trustee Council
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We therefore strongly urge the Council to include in its final work plan authorization for immediate acquisition of lands lying within the Kodiak National Wildlife Refuge. This authority presumably could be included as part of existing Projects 93059 and 93064 or be addressed separately in a new project aimed specifically at land acquisition within the Refuge.

On behalf of the World Wildlife Fund, thank you for your consideration of our comments on the 1993 Draft Work Plan.

Yours very truly,

A handwritten signature in cursive script, reading "Don Barry".

Donald J. Barry
Vice President
Land & Wildlife Program



KACHEMAK BAY CONSERVATION SOCIETY
P. O. Box 846 • Homer, Alaska 99603

93329208

11-18-92

To Whom it may Concern:

The following is our written comments in response to the 1993 Draft work plan.

1. We would like to see these funds managed responsibly - there is such a danger of too much of the funds going into agencies & this must be watched closely. We also suggest that as much work as possible be contracted out to the private sector, rather than have the agencies do it. It would be cheaper & more fair in the long run. Please put as many of these projects as possible out to bid & have the agencies use their own budgets for their prospective projects.
2. We would like to see most of the funds spent on resource & habitat acquisition. The rest of the \$ could then be split between physical restoration & scientific studies.
3. We are against the murres project #106 - which wants to use decoys & dummy eggs. We suggest spending the allocated \$80,000 on fox eradication in the maritime refuges on the AK. Peninsula & Aleutian Islands. According to Biologists the murres killed in the oil spill were in the process

2

of migrating to these areas + the fox do an
an incredible amount of damage to the
bird populations.

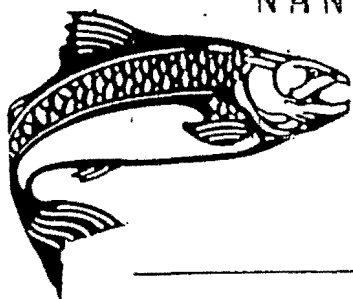
4. We strongly suggest using some of the
funds for the Kachemak Bay State Park
buyback. The outer coasts of the Kachemak
Bay Wilderness Park (both Parks are included
in the same system) was heavily impacted
by the oil spill. We think this would
be fair + wise use of these funds, since
these lands are threatened by clear cut
logging activity.

Please manage these funds ~~responsibly~~
responsibly + heed the wishes of the
public - these funds belong to us.

Thank you.

Kachemak Bay Conservation Society
Roberta Highland

NANWALEK TRADITIONAL COUNCIL



93329209



P.O. Box 8065
Nanwalek, Alaska 99603-6665
(907) 281-2248

November 20, 1992

EXXON VALDEZ OIL SPILL
PUBLIC INFORMATION CENTER
645 G STREET
ANCHORAGE, ALASKA

Dear Trustee Council Members,

I am a resident, and the Chief of the Native Village of Nanwalek. I am writing to you on behalf of the Nanwalek Traditional Council.

Since the EXXON VALDEZ OIL SPILL, we had lost our confidence of gathering our native foods, and we are trying to get back into our ways of life on the beaches surrounding us. It has been really rough for us, because of the impacts of the oil spill affecting our lives as subsistence users. The people of Nanwalek rely heavily on gathering native foods, especially in the winter months. That is when jobs are scarce, and the next place to look for food is on our beaches.

The people and the Nanwalek Traditional Council are supporting the Chugachmiut's Natural Resource Department in getting restoration funds for a possible clam reseed on Passage Island or Dog Fish Bay, where there was lots of clams.

Please consider our needs. Subsistence is very important to the people of Nanwalek.

Sincerely,

Vincent Kvasnikoff, NTC Chief.

**The Governing Body
of the Native Village of:**
NANWALEK

November 20, 1992

James R. Kwasnikoff
Box 8006
Nenahalek, Alaska 99603

93329210

Exxon Valdez Oil Spill
Public Information Center
645 "C" Street
Anchorage, Alaska

Dear Trustee Council Members,

I am a resident of Nenahalek, and I am writing to you in regards of supporting Chugachmiut Natural Resource Department in obtaining restoration funds for a possible clam bed on Passage Island or in Dog Flat Bay.

Since the Oil Spill I had lost confidence with gathering my native foods, I feel the same way today, but I am trying to gain it back. It is not the same anymore, but if we receive funds to plant clams, maybe my confidence will come back. This is very important, and we are relying on you for this purpose.

Please consider my letter of support, your funds will help us get some of our subsistence foods back.

Thank you,
James Kwasnikoff

19 November 1992

93329211

Exxon Valdez Oil Spill
Public Information Center
645 G. Street
Anchorage, AK 99501

Dear Trustee Council Member,

This letter is in regards to restoring some of the traditional subsistence area that were imported on destroyed by the ~~the~~ Exxon Valdez Oil Spill in the Chugach Region. I understand there is monies available to help restore some of the fisheries. As no amount of money can replace what has already been lost or damaged, help to restore the fisheries can help us to start enjoying and subsisting on foods that were here before. And no money can replace the fear that people has had of eating foods that was imported by the oil spill, a man made disaster.

But by trying to restore the fisheries in our areas, maybe life will have a chance to get back to the way it was and to pass on the traditional ways once again, ways that has always been so important. Maybe in some way it will ease the pain that we all have endured see our environment, foods and way of life changed.

This is why I support Chugachmint, 3300 "C" St.
Anchorage, AK, 99503; Natural Resource Department in
Seeking funding from the Exxon Valdez Oil Spill Restora-
tion Fund. The following projects are all important in
restoring and building the mariculture in the Chugach
Region. The projects are as follows: 1.

- ① Chugach Region Mariculture Project (93019), II
- ② The Bivalve Shellfish Hatchery and Research Center
(93020)
- ③ Subsistence Restoration Project (93017)
- ④ I also would like to support two additional
projects in our areas.
 - A. Clam restoration on Passage Island, Port
Graham, Nauyasak, Port Chatham, or Dogfish
Bay.
 - B. Nauyasak ^{Salmon} Enhancement Program.

With the support of monies from the Exxon
Oil Spill Restoration Fund, we can become
Self sustaining as we all work together to
reach this goal. We urge you to help support
our projects.

Sincerely,

Carol Kvasnickoff
P.O. Box 8006
Nauyasak, AK 99603

Emilie Suenning
PO Box 8055
Nanwalek, AK 99603

93329212

Exxon Valdez Oil Spill
Public Information Center
645 G. Street
Anchorage, Alaska

November 20, 1992

Trustee Council Member:

I am a resident of Nanwalek and a
Nanwalek Traditional Council Member.

I am writing in support of the restoration
of affected areas by the oil spill.

There were many subsistence foods lost.

I support the Nanwalek Salmon Enhancement
Project, Chugach Region Village Mariculture Project,
Bivalve Shellfish Hatchery and Research Center also
the shellfish project for the Nanwalek, Port Graham,
Port Chatham and Ogish Bay areas.

Please consider our needs! We would
to keep ~~and~~ restore our subsistence ways.

We also would like to provide jobs for
the people in our communities.

Thank you.

Emilie Suenning - Council Member

93329213

November 20, 1991

Dear Trustee Council members,

I am writing to you in regards to funds available to restore our subsistence foods.

I am the village chief's wife, and I am a subsistence user. I

I am in support of the Chugachmiut Natural Resource Department's proposal ~~of the~~ request on our behalf.

Since the 1989 oil spill there has been a feeling of lost heritage, "The Way of Life", ~~Subsistence Gathering~~ ^{native} foods

I urge you to support our subsistence life style, and consider the ~~Natural~~ Chugachmiut Natural Resources Department's Proposal.

It is for us.

Sincerely

Natale Kwasnikoff

93329214

P.O. Box 8074

NANWALEK, ALASKA

99603-6674

Nov. ~~18~~¹⁹ 1992

EXXON VALDEZ Oil Spill
Public Information Center
645 G. Street
Anchorage, Alaska.

Trustee Council Member.

I am writing to you regarding some traditional subsistence area which were destroyed by oil spill at Windy Bay + Port Chatham. I understand there is money available for restoration of lost resources which were affected by the oil spill. We feel nothing can replace the clam loss at Windy ^{Bay} + Port Chatham + would like to pursue clam restoration at Port Chatham + Passage Island which is located between Port Chatham + Nanwalek.

Please consider our needs we would like to help our people + communities by providing jobs opportunities, subsistence foods + economic development to our communities + people.

Thank you
Sincerely
Mark Krasnitsky

93329215

PO Box 8049
Nanwalek, AK
99603-6649
Nov 20, 1992

Exxon Valdez Oil Spill
Public Information Center
645 G. Street
Anchorage, ALASKA

Dear Trustee Council Member,

I am writing to you regarding some Traditional Subsistence area which were destroyed by the oil spill at Windy Bay and Port Chatham. I understand there is money available for restoration of lost resources which were affected by the oil spill. We feel NOTHING can replace the clam loss at Windy Bay, Port Chatham and would like to pursue clam restoration at Port Chatham and Passage Island which is located between Port Graham and Nanwalek.

Please consider our needs we would like to help our people and communities by providing jobs opportunities, subsistence foods and economic development to our communities and people.

Thank you.

Sincerely

Nancy P. Radtke



Alaska Center for the Environment

519 West 8th Avenue, Suite 201 • Anchorage, Alaska 99501 • (907) 274-3621

November 20, 1992

Exxon Valdez Trustee Council
645 G Street
Anchorage, AK 99501

Re: Draft 1993 Work Plan Comments

Dear Members of the Trustee Council:

The Alaska Center for the Environment welcomes the opportunity to comment on the above-referenced document. ACE is a private non-profit grassroots environmental education and advocacy organization whose members live primarily in Southcentral Alaska but also throughout Alaska and the United States.

We offer the following comments:

A. The Memorandum of Agreement and Consent Decree entered into by the United States and the State of Alaska states that the governments "shall jointly use all natural resource damage recoveries for the purposes of restoring, replacing, enhancing, rehabilitating or acquiring the equivalent of natural resources injured as a result of the Oil Spill and the reduced or lost services provided by such resources...". Restoration is defined as "any action...which endeavors to restore to their pre-spill condition any natural resource injured, lost, or destroyed...and the services provided by that resource or which replaces or substitutes for the injured, lost or destroyed resource and affected services".

Any project funded under this Work Plan must clearly meet these criteria. There are limited funds available, and in order to maximize the effectiveness of the civil settlement, funding must be approved only for those projects which clearly fall under the definition of restoration.

B. The overwhelming priority for this Work Plan, and all restoration efforts, must be to acquire habitat to protect the ecosystem from further damage, thereby maximizing the opportunity for injured resources and services to be restored. While certain discreet parcels may be identified as important for certain impacted species, in the vast majority of instances acquisition should not occur on a piecemeal or discreet parcel basis but rather over broad areas no smaller than entire watersheds. The reasons to pursue watershed-wide acquisitions include:

1. Limiting acquisitions to small areas (such as extended buffers along water bodies) ignores the network of

biological interactions necessary to maintain a functioning watershed/ecosystem, and therefore necessary for the recovery of resources and services. Restoration will be seriously compromised unless harmful activities such as logging and road-building are prevented within entire watersheds.

2. It is a basic tenet of modern resource management that resources should be managed at the watershed and ecosystem level. "Checkerboard" ownership patterns within watersheds and ecosystems seriously compromise effective resource management. If state and federal agencies are to manage the ecosystem in order to ensure recovery, consolidated and coordinated land and resource management is essential.

3. Preliminary indications are that at least some of the private landowners are not interested in selling their rights on a small-scale, limited basis, but rather over broad areas.

C. The resource management agencies represented by the Trustees have statutorily defined mandates to manage and protect the natural resources which belong to the people of the state and nation. Attempts by these same agencies to fund the ongoing management of these resources using settlement money is inappropriate and not allowed under the terms of the settlement. Proposed projects which would fund these ongoing management activities should be rejected.

E. While it is true that "there are not sufficient funds available to conduct all of the studies and projects which have been suggested and to acquire all of the habitat already proposed" as stated on page 12, it is possible that there is sufficient money to acquire most of the key habitat potentially available, if money is not squandered on unnecessary and inappropriately funded studies and agency budgets. Until discussions begin with all potential willing sellers, it is unknown how much habitat and other areas important for restoration can be acquired, and at what price.

F. Administrative expenses are inappropriately high. \$5.7 million for administration of \$17.8 million in studies, data collection, and other activities, an amount which represents a 32% cut of the pie, and is unacceptable.

G. The state and federal governments should not be reimbursing themselves for expenses incurred in relation to the spill, since they share in the responsibility for the tragedy. Certainly both governments should not be reimbursing themselves first, thereby limiting the amount of money available for immediate restoration

activities such as habitat acquisition.

H. Scientific studies and data collection should not be conducted by agencies, or contractors selected by agencies or the Trustees, without a competitive bid process and adequate peer review. Funding studies conducted by the same agencies represented by the members of the Trustees is a de facto conflict of interest. Agencies represented by the Trustees should not materially benefit by decisions of the Trustees.

The peer review process needs to be much more rigorous, observing the same standards and processes employed by the National Academy of Sciences and the National Science Foundation. Many of the project methodologies will not suffice to achieve their stated objectives, and a rigorous peer review process will identify these problems.

J. In light of the above comments, the projects we support at this time include the following:

93064 - Habitat acquisition clearly meets the legal criteria as well as the public policy criteria articulated not only in these comments but also by the overwhelming majority of the people in numerous hearings and meetings. However, funding should not be limited to the arbitrary figure of "up to \$20 million", nor should it be limited to "imminently threatened" parcels. The "imminent threat" criteria will unnecessarily complicate negotiations, increase the price, and skew the process to favor those who "rev up" their bulldozers and chainsaws first. The imminent threat criteria also ignore the reality that private land and timber owners face in their need to plan operations years in advance and enter into long term contracts. Most if not all lands with commercial timber value, for instance, are already subject to long term planning and commitments. Therefore, informal discussions should begin immediately with all land and resource owners, and formal negotiations should follow with identified willing sellers. Because of these realities, most if not all private lands are imminently threatened, and meet the time dependent criteria we support for projects funded under this work plan.

Acquisition should be pursued throughout the impacted ecosystem, not just in areas adjacent to oiled shorelines. This is important not only for impacted species which range throughout the region, but also for services.

93034 - Pigeon Guillemot Colony Survey

93041 - Comprehensive Restoration Monitoring

93042 - Recovery Monitoring of Killer Whales - We disagree with Dr. Spies opinion that Killer Whales were not impacted by the spill. Available data suggest otherwise.

93045 - Marine Bird / Sea Otter Surveys - We support, except that we do not support the portion of this project which calls for sea otter surveys conducted from boats, which has proven to be inappropriate methodology.

93051 - Habitat Protection Information - We support some aspects of this project except for the portion which proposes to use these funds for anadromous stream channel surveys on public lands, which are very important but should be funded through agency budgets.

93052 - Identification and Protection of Bald Eagle Habitat - We disagree with Dr. Spies' statement that surveys suggest that the spill has not affected the bald eagle population. In fact, the impacts apparently weren't measured because adequate baseline data did not exist, but this does not mean they did not occur.

K. In light of the above comments, the projects we oppose include the following:

93009 - Public Information, Education and Interpretation - This type of "public information, education and interpretation" is an ongoing responsibility of the USFS, and should be performed with their operating budget, not with Settlement funds. "Educating users about minimum impact use" was a USFS responsibility prior to the spill, and continues, regardless of the spill. Spending nearly a third of a million dollars on a public affairs specialist, brochures and videos is unnecessary, appears to be an attempt to augment the USFS budget, and should be rejected. Moreover, this type of project, if funded, should be contracted out to local businesses in the region.

93010 - Reduce Disturbance Near Murre Colonies - While we support the need to reduce disturbance at murre colonies, this should be funded as an ongoing responsibility of the resource agencies.

93022 - Evaluating the Feasibility Enhancing Productivity of Murres - We question the technical feasibility and practicality of this proposal, and whether it can be carried out on a large enough scale to produce an increase in murre populations.

93026 - Fort Richardson Hatchery and Water Pipeline - This project has no connection to injured resources or services within the terms of the settlement.

93028 - Restoration and Mitigation of Wetlands - We support the maintenance of functioning forest ecosystem processes, and oppose efforts to reverse these processes. Moreover, the inventory of existing habitat was to have already been done prior to construction of the new road, and if not previously completed should be ongoing now as part of the Montague Island tundra vole habitat assessment. At least some of the site proposed for

flooding is likely to be important for the tundra vole, which is a "candidate" species under the endangered species act. Implementation of restoration option number 25 is best pursued through acquisition of habitat.

93029 - PWS Second Growth Management - By far the most effective way to provide habitat for the impacted species is to acquire existing old growth; this effort to "develop" old growth won't actually result in old growth for many decades. Certainly there is no reason to pursue this option in this 1993 restoration plan, since we should be focusing on immediate actions, not projects which will take decades before they are effective.

93030 - Red Lake Restoration - We oppose this project because of the danger of introducing disease into a pristine wild stock.

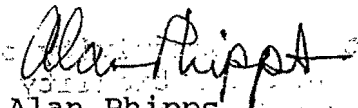
93031 - Red Lake Mitigation - We also oppose this project due to the danger of introducing disease into wild stocks.

93050 - Update Information... - This should only be done as a part of the agency budget.

M. In regards to fish projects, as a matter of principal we support projects which restore stocks damaged as a result of the spill and through which settlement monies can be used efficiently and appropriately, especially in relation to maintenance of wild stocks. We are not currently in a position to comment on each project in detail, except for those previously discussed, and we therefore reserve judgement.

If you have any questions or need additional information, please do not hesitate to call.

Sincerely,



Alan Phipps
State Lands Specialist

TABLE 2

Cross-tabulation of Comments by Project ID

Project # 93002 Total Comments: 6

93321007, 93323013, 93325050, 93325149, 93327159, 93328196

Project # 93003 Total Comments: 9

93321007, 93324028, 93325042, 93325050, 93325149, 93327159
93328183, 93328196, 93328197

Project # 93004 Total Comments: 10

93304001, 93310003, 93321007, 93324021, 93324028, 93325042
93325050, 93325149, 93327159, 93328196

Project # 93005 Total Comments: 11

93321007, 93325049, 93325050, 93325149, 93325151, 93325205
93327159, 93328160, 93328189, 93328193, 93328196

Project # 93006 Total Comments: 14

93321007, 93323017, 93324029, 93325049, 93325050, 93325149
93325151, 93327159, 93328183, 93328189, 93328193, 93328196
93328197, 93328203

Project # 93007 Total Comments: 15

93321007, 93323017, 93324029, 93325038, 93325049, 93325050
93325149, 93325151, 93327159, 93328160, 93328183, 93328189
93328193, 93328196, 93328203

Project # 93008 Total Comments: 13

93310003, 93323017, 93324029, 93325038, 93325049, 93325050
93325149, 93325151, 93327159, 93328183, 93328189, 93328193
93328196

Project # 93009 Total Comments: 25

93321007, 93323018, 93324021, 93325038, 93325040, 93325050
93325149, 93325151, 93325158, 93325205, 93325216, 93327159
93328160, 93328163, 93328165, 93328177, 93328178, 93328183
93328184, 93328187, 93328189, 93328191, 93328193, 93328196
93328197

Project # 93010 Total Comments: 11

93310003, 93321007, 93323012, 93325038, 93325149, 93325158
93325216, 93327159, 93328160, 93328193, 93328196

Project # 93011 Total Comments: 10

93321007, 93323017, 93324021, 93325038, 93325149, 93325151
93325158, 93327159, 93328196, 93328197

Project # 93012 Total Comments: 9

93321007, 93323013, 93325042, 93325050, 93325149, 93327159
93328160, 93328193, 93328196

Project # 93014 Total Comments: 9

93304001, 93321007, 93325042, 93325149, 93327159, 93328160
93328183, 93328193, 93328196

Project # 93015 Total Comments: 7

93321007, 93323013, 93325042, 93325050, 93325149, 93327159
93328196

Project # 93016 Total Comments: 61

93304001, 93321007, 93323014, 93323017, 93323020, 93324023
93324024, 93324025, 93324026, 93324030, 93324031, 93324032
93324033, 93324034, 93325042, 93325052, 93325061, 93325066
93325067, 93325069, 93325070, 93325073, 93325074, 93325075
93325076, 93325077, 93325078, 93325079, 93325080, 93325081
93325091, 93325096, 93325099, 93325125, 93325126, 93325127
93325128, 93325129, 93325130, 93325131, 93325132, 93325133
93325134, 93325135, 93325136, 93325137, 93325138, 93325139
93325140, 93325141, 93325142, 93325143, 93325144, 93325145
93325146, 93325149, 93325151, 93327159, 93328196, 93328197
93329206

Project # 93017 Total Comments: 65

93304001, 93321007, 93323010, 93323014, 93323020, 93324023
93324024, 93324025, 93324026, 93324030, 93324031, 93324032
93324033, 93324034, 93325052, 93325053, 93325061, 93325066
93325067, 93325069, 93325070, 93325073, 93325074, 93325075
93325076, 93325077, 93325078, 93325079, 93325080, 93325081
93325087, 93325091, 93325096, 93325099, 93325100, 93325125
93325126, 93325127, 93325128, 93325129, 93325130, 93325131
93325132, 93325133, 93325134, 93325135, 93325136, 93325137
93325138, 93325139, 93325140, 93325141, 93325142, 93325143
93325144, 93325145, 93325146, 93325149, 93325151, 93325205
93327159, 93328196, 93328197, 93329206, 93329211

Project # 93018 Total Comments: 12

93310003, 93321007, 93323017, 93324021, 93325038, 93325042
93325043, 93325149, 93325151, 93327159, 93328196, 93328197

Project # 93019 Total Comments: 98

93304001, 93307002, 93310003, 93321007, 93323011, 93323014
93323020, 93324021, 93324023, 93324024, 93324025, 93324026
93324030, 93324031, 93324032, 93324033, 93324034, 93325038
93325042, 93325052, 93325053, 93325058, 93325060, 93325061
93325066, 93325067, 93325068, 93325070, 93325073, 93325074
93325075, 93325076, 93325077, 93325078, 93325079, 93325080
93325081, 93325086, 93325087, 93325089, 93325090, 93325091
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93325136, 93325137, 93325138, 93325139, 93325140, 93325141
93325142, 93325143, 93325144, 93325145, 93325146, 93325149
93325151, 93325152, 93327159, 93328196, 93328197, 93329206
93329211, 93329212

Project # 93020 Total Comments: 90

93307002, 93310003, 93321007, 93323014, 93323020, 93324023
93324024, 93324025, 93324026, 93324030, 93324031, 93324032
93324033, 93324034, 93325038, 93325052, 93325053, 93325054
93325055, 93325056, 93325057, 93325058, 93325060, 93325061
93325062, 93325063, 93325064, 93325065, 93325066, 93325067
93325068, 93325069, 93325070, 93325071, 93325073, 93325074
93325075, 93325076, 93325077, 93325078, 93325079, 93325080
93325081, 93325086, 93325087, 93325089, 93325090, 93325091
93325092, 93325093, 93325095, 93325096, 93325099, 93325118
93325119, 93325120, 93325121, 93325123, 93325124, 93325125
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93325132, 93325133, 93325134, 93325135, 93325136, 93325137
93325138, 93325139, 93325140, 93325141, 93325142, 93325143
93325144, 93325145, 93325146, 93325149, 93325151, 93325152
93327159, 93328183, 93328196, 93329206, 93329211, 93329212

Project # 93022 Total Comments: 16

93304001, 93310003, 93321007, 93325149, 93325158, 93325205
93325216, 93327159, 93328160, 93328170, 93328171, 93328183
93328196, 93328197, 93328204, 93329208

Project # 93024 Total Comments: 13

93304001, 93310003, 93321007, 93324021, 93324028, 93325042
93325050, 93325149, 93328160, 93328183, 93328193, 93328196
93328197

Project # 93025 Total Comments: 15

93304001, 93310003, 93321007, 93324021, 93324028, 93325042
93325050, 93325149, 93325151, 93327159, 93328160, 93328183
93328189, 93328196, 93328197

Project # 93026 Total Comments: 27

93304001, 93310003, 93321007, 93324021, 93324022, 93325038
93325039, 93325040, 93325149, 93325157, 93325158, 93325216
93327159, 93328160, 93328163, 93328164, 93328165, 93328167
93328168, 93328177, 93328178, 93328182, 93328183, 93328187
93328189, 93328193, 93328196

Project # 93028 Total Comments: 12

93321007, 93324028, 93325038, 93325050, 93325149, 93325158
93325216, 93327159, 93328160, 93328183, 93328189, 93328196

Project # 93029 Total Comments: 20

93321007, 93324021, 93325038, 93325040, 93325050, 93325149
93325151, 93325158, 93325216, 93327159, 93328160, 93328165
93328169, 93328177, 93328178, 93328183, 93328187, 93328191
93328196, 93328197

Project # 93030 Total Comments: 10

93321007, 93325050, 93325149, 93325158, 93325216, 93327159
93328160, 93328183, 93328193, 93328196

Project # 93031 Total Comments: 10

93304001, 93321007, 93325050, 93325149, 93325158, 93325216
93327159, 93328160, 93328193, 93328196

Project # 93032 Total Comments: 10

93321007, 93323017, 93324021, 93325042, 93325050, 93325149
93327159, 93328183, 93328196, 93328197

Project # 93033 Total Comments: 15

93310003, 93321007, 93323017, 93325036, 93325038, 93325050
93325149, 93325151, 93325205, 93327159, 93328160, 93328183
93328193, 93328196, 93328197

Project # 93034 Total Comments: 13

93321007, 93323017, 93324021, 93325038, 93325149, 93325205
93325216, 93327159, 93328160, 93328183, 93328189, 93328193
93328196

Project # 93035 Total Comments: 12

93321007, 93324021, 93325050, 93325149, 93325151, 93325205
93327159, 93328160, 93328183, 93328189, 93328193, 93328196

Project # 93036 Total Comments: 11

93321007, 93323017, 93325050, 93325149, 93325151, 93328160
93328183, 93328189, 93328193, 93328196, 93328197

Project # 93038 Total Comments: 11

93321007, 93325050, 93325149, 93325151, 93327159, 93328160
93328183, 93328189, 93328193, 93328196, 93328197

Project # 93039 Total Comments: 8

93317004, 93321007, 93325050, 93325149, 93327159, 93328160
93328183, 93328196

Project # 93041 Total Comments: 9

93321007, 93325050, 93325149, 93325151, 93325216, 93327159
93328160, 93328193, 93328196

Project # 93042 Total Comments: 11

93321007, 93325038, 93325050, 93325149, 93325216, 93327159
93328160, 93328183, 93328189, 93328193, 93328196

Project # 93043 Total Comments: 12

93321007, 93324021, 93325036, 93325042, 93325050, 93325149
93327159, 93328160, 93328189, 93328193, 93328196, 93328199

Project # 93045 Total Comments: 14

93321007, 93323017, 93325036, 93325038, 93325050, 93325149
93325151, 93325205, 93325216, 93327159, 93328160, 93328183
93328193, 93328199

Project # 93046 Total Comments: 61

93321007, 93323014, 93323020, 93324021, 93324023, 93324024
93324025, 93324026, 93324030, 93324031, 93324032, 93325038
93325042, 93325050, 93325052, 93325053, 93325061, 93325066
93325067, 93325069, 93325070, 93325073, 93325074, 93325075
93325076, 93325077, 93325078, 93325079, 93325081, 93325091
93325096, 93325099, 93325125, 93325126, 93325127, 93325128
93325129, 93325130, 93325131, 93325132, 93325133, 93325134
93325135, 93325136, 93325137, 93325138, 93325139, 93325140
93325141, 93325142, 93325143, 93325144, 93325145, 93325146
93325149, 93325151, 93327159, 93328160, 93328193, 93328196
93329206

Project # 93047 Total Comments: 8

93321007, 93325050, 93325149, 93325151, 93328160, 93328183
93328193, 93328196

Project # 93050 Total Comments: 7

93321007, 93325149, 93325158, 93325216, 93328160, 93328183
93328196

Project # 93051 Total Comments: 15

93321007, 93323010, 93324021, 93324028, 93325042, 93325050
93325149, 93325151, 93325216, 93328160, 93328165, 93328168
93328177, 93328193, 93328196

Project # 93052 Total Comments: 16

93310003, 93321007, 93325038, 93325041, 93325042, 93325044
93325046, 93325149, 93325205, 93325216, 93328160, 93328186
93328189, 93328193, 93328200, 93328202

Project # 93053 Total Comments: 4

93321007, 93325149, 93328193, 93328196

Project # 93057 Total Comments: 3

93321007, 93325149, 93328196

Project # 93059 Total Comments: 12

93321007, 93325042, 93325149, 93328160, 93328177, 93328178
93328183, 93328187, 93328190, 93328191, 93328196, 93329207

Project # 93060 Total Comments: 11

93321007, 93324028, 93325038, 93325149, 93328160, 93328178
93328183, 93328187, 93328190, 93328191, 93328196

Project # 93061 Total Comments: 10

93310003, 93321007, 93324028, 93325038, 93325149, 93325151
93325205, 93328160, 93328183, 93328196

Project # 93062 Total Comments: 3

93325149, 93328183, 93328196

Project # 93063 Total Comments: 11

93304001, 93321007, 93323017, 93324021, 93324028, 93325042
93325149, 93328160, 93328183, 93328193, 93328196

Project # 93064 Total Comments: 48

93321007, 93323015, 93323016, 93323018, 93324022, 93324029
93324035, 93325036, 93325038, 93325039, 93325040, 93325042
93325050, 93325051, 93325149, 93325151, 93325158, 93325205
93325216, 93328160, 93328162, 93328163, 93328164, 93328165
93328166, 93328167, 93328168, 93328169, 93328170, 93328171
93328172, 93328173, 93328174, 93328175, 93328176, 93328177
93328178, 93328179, 93328180, 93328181, 93328182, 93328183
93328187, 93328189, 93328190, 93328191, 93328196, 93329207

1993 DRAFT WORK PLAN COMMENTS IN RELATION
TO 93-030; 93-031; 93-032.

93304001
93321007
93323017
93324021
93325042
93325050
93325149
93325158
93325216
93327159
93328160
93328183
93328193
93328196
93328197
93328296