

COMMENTS

93307001
9330001
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You are invited to share your ideas and comments with the **PRYON VALDEZ OIL SPILL TRUSTEE COUNCIL**.
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**.

As a life long resident of P.W.S., being 1/4 native, a subsistence user and a com. fisherman, I agree with Dr. Spies grading with the exceptions of the following projects which I have changed the score on;

PROJECT #S	SCORE	COMMENTS
93004	2	I think it a good idea
93014	2	I think that 1992 we saw some of the effect of oil returns on the pink salmon
93016	2	GOOD PROJECT
93017	2	GOOD PROJECT
93019	3	
93022	4	
93024	2	GOOD PROJECT
93025	2	" "
93026	3	
93031	3	
93048		I couldn't find this one in my copy
93063	2	GOOD PROJECT

The more we can do for the resources that were damaged and the subsistence users ~~that~~ that were denied and the commercial fishermen that were denied, the better the sound will be.

Thank you
C. M. deVillie

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.

Local advisory board
P.W.S.

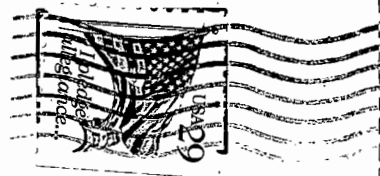
Additional Comments:

68

68

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

C. M. DeVille
Box 632
Cordova, Alaska
99574



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

Attn: 1993 Draft Work Plan


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DEC 08 1992EXXON VALDEZ OIL SPILL
TRUSTEE COUNCIL
ADMINISTRATIVE RECORD

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

Dear Sirs:

I would like to support project 93019 Chugach Region Village Mariculture Project and 93020 Bivalve Shellfish Hatchery and Research Center. The shellfish mariculture industry offers tremendous potential for economic recovery of these regions. One of the real losses resultant from the oil spill was the shellfish populations. These projects could restore shellfish populations and provide economic benefits to Prince William sound and other coast regions throughout Alaska.

Sincerely,


Jeff Hetrick
P.O. Box 7
Moose Pass, Alaska 99631

COMMENTS

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Please use this tear sheet to present your views on the 1993 Draft Work Plan.
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- PROJECT # 93004 should be deleted from the plan as it is not a cost effective way to enhance pink salmon harvests.
- PROJECT # 93008 should be consolidated with 93006 to save duplication of intent.
- PROJECT 93010 should be able to be conducted with current FWS personnel + not require additional hire.
- PROJECT 93018 Unnecessary funding for a project with fairly new raw data that can be obtained elsewhere. Scrap it!
- PROJECT 93019 IS THIS A FARM SUBSIDY OR WHAT. Let the native corps set up their own businesses. Scrap it!
- PROJECT 93020 why spend money to determine a feasibility based on incomplete impact studies. This project stretches the funds intentions. Get rid of it. Too much money for whats involved.
- PROJECT 93022 Not a viable use of VOS money directly.
- PROJECT 93024 Absurd! no way! Forget it.
- PROJECT 93025 Seems very expensive to determine what is already known; oil kills ducks during a spill and long after.
- PROJECT 93033 what next? a water pipeline to California? NO WAY
- PROJECT 93026 Eagles seem to be doing fine. Let's leave them alone.
- PROJECT 93052 Wow, a non-specific half mil. Is it a necessary Grab bag?
- PROJECT 93061

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Additional Comments:

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BOX 2500

VALDEZ, AK

99686

Place
Stamp
Here

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

Attn: 1993 Draft Work Plan

93317004
93317004

MARINE RESEARCH SPECIALISTS

2825 S. RODEO GULCH ROAD, SUITE 3
SOQUEL, CALIFORNIA 95073
Phone: (408) 464-8264 • Telefax: (408) 464-8266

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EXXON VALDEZ OIL SPILL
TRUSTEE COUNCIL
ADMINISTRATIVE RECORD

November 9, 1992

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

Dear Trustee Council:

Regarding the 1993 Draft Work Plan, I urge you to put the studies out for competitive bid. I am convinced that such a move would not diminish the quality of science provided to the trustees, but would provide more cost-effective programs. In particular, I would be interested in bidding on Project Number 93039, the Herring Bay Experimental and Monitoring Studies.

Please place me on your mailing list for receiving information concerning draft and final work plans.

Sincerely,

Dane Hardin

Dane Hardin

COMMENTS

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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. SPILL
TRUSTEE COUNCIL
ADMINISTRATIVE RECORD

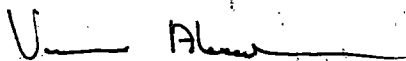
November 6, 1992

I am writing to offer comments on the 1993 Draft Work Plan for the Exxon Valdez Oil Spill Restoration. The range of projects presented is comprehensive, and by and large important and relevant. However, I am concerned that there is no provision for long-term studies of the kind needed to provide adequate knowledge of the system. As things stand, we will not be much better off in the event of another disaster than we were when the Exxon Valdez struck the reef. Nor will the new or renewed projects provide for this need in themselves.

We need to understand the natural variability and the nature of physical and biological episodic events. Subarctic marine systems are highly seasonal with major year-to-year variability, and because of this, a long-term view of the marine environment is essential. Ideally, the Prince William Sound/Gulf of Alaska area, including downstream regions, should be approached in an integrated way. However, even without this, and recognizing the limitation of resources available, selected long-term approaches need to be implemented.

An endowment based on at least part of the settlement funds would be an excellent way of assuring some long-term research. Senator Arliss Sturgulewski's proposal is particularly appropriate, and should be considered very seriously as an approach.

Finally, in addition to the individual projects and the endowment investment, it would be prudent to put some resources into coastal education, research, and impact assessment facilities. This, too, would put us in a better position to respond.



Vera Alexander
Dean, School of Fisheries and Ocean Sciences
University of Alaska Fairbanks
Fairbanks AK 99775
(907) 474-7531

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: -----

Vern Alascaden
School of Fisheries and Sciences
University of Alaska - Fairbanks
Fairbanks AK 99775



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

Attn: 1993 Draft Work Plan



93321006
Institute of Marine Science

UNIVERSITY OF ALASKA FAIRBANKS

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Fairbanks, Alaska 99775-1080

11 November 1992

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

EXXON VALDEZ OIL SPILL
TRUSTEE COUNCIL
ADMINISTRATIVE RECORD

RE: Comments on the 1992 Draft Work Plan, EXXON VALDEZ oil spill restoration.

I found it very difficult to comment on the appropriateness of the funding of these projects when I do not know what the total available budget is. The newspapers are always talking about massive sums of money for timber buy-back. How does that affect the funds available for restoration with regard to science? I believe money spent on the understanding the ecosystem is much more appropriate than any timber buy-backs.

As proposed, this Restoration Plan does not have a comprehensive unifying theme. I believe that theme should be understanding the ecosystem of Prince William Sound and the western Gulf of Alaska. I do not see that in the proposed plan. There is no attempt to link the proposed individual studies of specific species. I cannot even find a linkage among studies on the same species. The common element is the ecosystem in which all of these species live. That ecosystem includes more than just the species proposed to be studied. It includes other high trophic level consumers which are competitors. It includes lower trophic levels as food for the species in question. It includes the physical, chemical and geological elements which drive the system, including currents, nutrients and primary production. It also includes all life stages of all trophic levels.

I realize that it is not humanly or fiscally possible to study every thing in all places and all time frames. However, it is possible to design a baseline study which would produce new, comprehensive knowledge about PWS and the Gulf of Alaska. At this point in time we do not know more about the overall working of this area than we did prior to the 1989 oil spill. After the completion of the proposed projects we still will not know. We will know about birds and salmon and some mammals, but we will not know how and why the currents move as they do, what conditions cause good primary production in some years, why some species are more abundant in some years. The proposed studies ignore all the natural variability in the ecosystem. These studies will produce population estimates for some species, but many more species, which are not as directly important commercially, are ignored. The suggested studies imply that the year-class strength of salmon is completely dependent upon the spawning stock and conditions in the natal stream. There is little to nothing known about what salmon need or encounter in the marine environment. Birds are dependent on more than just salmon for food, but there is no attempt to study forage species like capelin or sand lance or juvenile pollock. A glance at the table of contents of this Draft Plan leads one to believe that PWS and the Gulf of Alaska are total pelagic

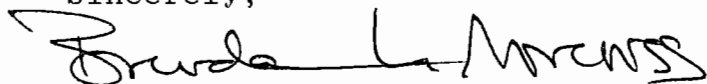
ecosystems. All groundfish and most shellfish have been ignored in these studies. Insufficient studies have been completed to show that oil has no effect on this component. Even if oil does not directly affect the bottom dwelling species (which is hard to believe considering they are on the bottom, where the oil goes), these species still interact with the components of the ecosystem which are being studied.

This is a classic case of the blind men touching the elephant and trying to describe it. How can you attempt to implement a "Restoration" Plan if you arbitrarily limit certain parts of the ecosystem as worthy of consideration, e.g. salmon and birds? These studies, as proposed, will contribute new and valuable knowledge to our understanding of the species themselves. However, when the next oil spill occurs, while we will know how many salmon and birds there are, there will be a lot of factors which could affect them that have not been considered. A great many basic questions will still be unanswered. If we do not know what the inherent variability in the ecosystem is prior to the spill, we cannot sort out the effects of an oil spill from those of nature. The worst case scenario is exactly what happened to pink salmon in 1990. There was a record return of salmon to PWS that year and everyone said the oil spill had no deleterious effect, or in fact might have been good. However, since there was no means to measure the effects of the natural environment on pink salmon survival, there was no way to prove that the returns were below what would have naturally occurred and therefore were negatively affected by the oil spill.

In summary, this plan does not do enough. It is not comprehensive. It ignore vital components which contribute to the ecosystem as a whole. My personal belief is that if something bad happens, one should try to get something good from it. Something bad did happen, the Exxon Valdez oil spill. With this restoration money, there is the potential for something good to result, i.e., a greater understanding of the ecosystems of PWS and the Gulf of Alaska. The studies to date are pieces, but not enough to build the picture. The proposed studies are just more pieces, and they do not add as much to the picture as some of the previous studies. This very incomplete picture is going to be painfully obvious when we have another oil spill and ask some of the exact same questions that we asked in 1989 and still cannot answer them. I recommend NOT funding these studies until a comprehensive plan is in place. If you are going to fund some field studies before the comprehensive plan is in place, fund more field work than you think you will need. Do not be so limited. This study is too narrow and needs to be opened to the thinking of innovative scientists who can see beyond single species approaches.

I hope that you will seriously consider the points that I have made.

Sincerely,

A handwritten signature in dark ink, appearing to read "Brenda L. Norcross". The signature is fluid and cursive, with the first name "Brenda" being more prominent and the last name "Norcross" following in a similar style.

Brenda L. Norcross
Assistant Professor of Fisheries Oceanography
(907) 474-7990



NORTH GULF OCEANIC SOCIETY

P.O. BOX 15244
HOMER, ALASKA 99603
(907) 235-6590

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VALDEZ OIL SPILL
TRUSTEE COUNCIL
ADMINISTRATIVE RECORD

Comments on the 1993 Draft Work Plan from the Exxon Valdez Oil Spill Trustees

Although there are some good solid projects in the 1993 Draft Work Plan, basic problems exist with many proposals and their justifications. Most restoration will be effected by natural means, our enhancement of those processes is problematic in most cases. The suitability of proposals should not be linked solely to physical restoration, but consider other subtopics under the broad title of restoration.

It would be more realistic for the Trustee Council to determine a percentage of the settlement to be used for 1) Physical restoration projects 2) Relevant scientific research and monitoring 3) Habitat protection/ acquisition. Probably the smallest percentage of total funds should be allocated for true physical restoration. Opportunities are limited in this area. It is clear from the draft plan that most projects do not fit into this category. A substantial percentage should be directed to solid scientific work including monitoring and pure research that may have current or future applicability in the spill area. Preferably this would be accomplished via an endowment and review committee as suggested by Senator Sturgelewski. The cost of studies would be substantial reduced if a competitive bid environment open to the private sector was encouraged. Additionally, a very substantial percentage of the settlement should be allocated to habitat protection/ acquisition. This idea has broad public support and will take sizeable funding to be effective (far more than the \$20 million in the proposed habitat protection fund proposal 93064). Such immediate projects as the Kachemak Bay State Park buyback should be high on the list.

In general, the price tags on most of the projects presented in the draft work plan seem very high. This situation could be remedied to an extent by placing many projects in a competitive bid arena or trimming budgets within the current framework of the project. A more careful scrutiny of the budgets within each project would seem warranted.


Craig Q. Matkin, Director

COMMENTS

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EXXON VALDEZ OIL SPILL

TRUSTEE COUNCIL

ADMINISTRATIVE RECORD

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

Review of the EXXON VALDEZ Oil Spill Restoration Plan, 1993 Draft Work Plan

The 1993 draft work plan emphasizes the higher trophic levels of the Prince William Sound ecosystem. After a decade of studies of the type described, will we have a better understanding of the natural variability of Prince William Sound? While the studies included might be able to give populations statistics, they are not addressing the potential causes of that variability. We now suspect that there are very large interannual changes in the ocean climate and marine meteorology in this part of the North Pacific. As a matter of fact, the original accident could be traced to unusual circumstances in the atmospheric circulation in 1989. The normal circulation patterns disappeared causing clear and cold conditions over Southcoast Alaska which resulted in possible change in the ocean circulation in Prince William Sound that allowed the ice from Columbia Bay to enter the shipping lanes. Nowhere in the plan is an attempt to gain a better knowledge of the processes that affect conditions within the Sound. After a decade of studies we will be as ignorant as we were on 24 March 1989.

A study that should accompany the restoration work is one to address the variability of the marine ecosystem including the lower trophic levels. We know that ocean temperatures outside the Sound (near Seward) have a very large annual and interannual variability. These have been shown to affect some fisheries populations in the Gulf of Alaska but the mechanism(s) for their influences are unknown. Is it temperature, nutrient, fresh water discharge, or primary production variability, or something else? In any case, natural interannual variability exists and must be taken into consideration, but no studies of these variations are included. It might be noted that the oil was dumped into the marine ecosystem and the response of that system should be investigated.

We should be better prepared for the next Prince William Sound spill. A more thorough knowledge of how the ecosystem operates will help us next time. An improved understanding of ocean circulation would help predict the position of ice flows out of Columbia Bay and better predict the trajectory of the spilled oil to help contain it or mitigate the damage. We need to where the most sensitive regions of the Sound are located to be compared with the most likely oil impacted regions.

Clearly, a better understanding of the Prince William Sound ecosystem will be required in the upcoming decades. We need to start on this as soon as possible. The work is required as vital part of the restoration work.

Thomas C. Royer

Professor of Marine Science and Chancellor's Faculty Associate for Research
University of Alaska

Fairbanks, Alaska 99775

(907) 474-7835 T.ROYER (Telemail), royer@ims.alaska.edu (Internet)

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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T. Royer

IMS, Univ. of AK

Fairbanks, AK 99775



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

Attn: 1993 Draft Work Plan

COMMENTS

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VALDEZ OIL SPILL
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Given that the process of evaluating damage and determining areas for restoration is an exceedingly complex one, the plan is none-the-less lacking in some fundamental ways:

1. Proposals are listed in the absence of any general understanding by the public of how this work was deemed important enough to make the list of "recommended" studies/activities. An important process of science is yet to be played out, that being the public disclosure of oil-spill damage assessments scheduled for early next year. It seems somewhat premature (to me) to be asking for an evaluation of the 1993 work plan before a broader context for undertaking the restoration process is defined. In fact, there seems to be some confusion about what exactly constitutes restoration activity in the opinion of the Trustee Council, and more fundamentally, who participates in the activity.

2. There are questions about the scientific rigor with which projects are selected for funding. Have these "candidate projects" been subject to serious peer review outside the agencies? Those of us looking at the process understand that projects make the "recommended for funding list" only by a unanimous vote of the Trustees. This supposes that the all Council members are equally knowledgeable about all matters pertaining to resource damage and what should be attempted through restoration. I wonder if this is the case?

3. As a professional marine scientist, I am troubled by what appears to be a lack of appreciation for the "ecosystem" within which the restoration activities are being planned. I can understand the agency positions of "top down" emphasis, after all resource managers are rarely trained in the ocean sciences. However there is a danger that most, if not all the resource restoration activity may be undertaken without regard to the broader ecosystem structure and external forcing that sets the constraints on biological productivity. It seems only reasonable that a program of ecosystem/environmental monitoring be initiated so that the results of restoration activities can be evaluated in the context of interannual and longer-term oceanic variability in the region.

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

R.T. COONEY

INST. MAR. SCIENCE

UNIV. ALASKA FAIRBANKS

FAIRBANKS, ALASKA 99775-1080



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

Attn: 1993 Draft Work Plan

The following are specific comments on each proposal:

Number	Comments
93002	Good basic research. Very high price tag, but a good potential for competitive open bid
93003	Important for continued damage assessment and clarification. Probably best continued by ADF&G
93004	A very interesting project, but perhaps more important in assessing the effects of hatcheries than of the oil spill. Should be open to bid if approved.
93005	This could possibly be combined with 93006 to be more cost effective and bid out to local museums or groups
93007	This project if bid out would be much more cost effective and important to the public than the 93006 which would seem to be more "padding" for an agency budget.
93009	The Pratt Museum of Homer has created an excellent traveling oil spill exhibit that could be adapted for this use. Isn't this redundant?
93010	A worthwhile attempt, and truly restoration oriented, but should be bid out to reduce cost
93011	This responsibility should be inherent in ADFG management duties and would not seem to require this kind of funding
93012	Again a worthwhile project on an impacted system but it could be done at lower cost by consulting firms that specialize in genetics work.
93014	An interesting project but not of the highest priority and not directly related to spill effects
93015	A huge budget to manage Upper Cook Inlet. Is this really justified or just "padding" for ADF&G
93016	Poor justification for fish stocking. There are plenty of uncontaminated salmon in the area for subsistence.
93017	General idea is good by is a budget in excess of 300K justified? Seems extremely costly.

- 93018 Relationship of this project to the spill is unclear. Again it seems to be funding of management that is not justified at a high price.
- 93019 Nearly 600K to start oyster farming for the Chugach Region? This is an economic development project that has little relation to the oil spill. Oysters were not traditional subsistence food.
- 93020 It is questionable whether this would really aid or speed the recovery of wild mussels.
- 93022 An interesting project that might aid recovery of murre. Should be competitively bid.
- 93024 This is potentially a worthwhile project but is not directly spill related. Probably best carried out by ADF&G.
- 93025 Again a good solid project reestablishing historic fish runs, but not necessarily related to oil damage.
- 93026 Weak link to spill damage and restoration. The price tag of 3.5 million makes this a major project. Project should be bid out if selected.
- 93028 An interesting project of questionable relevance to spill damage. Long-term expensive project, this funds only the design work.
- 93029 This will do little good compared to resource acquisition and habitat protection. Seems a token project
- 93030 Similar to Kenai Lake situation, a reasonable project that may speed recovery if escapements fall below 150,000.
- 93031 Should increased hatchery production be funded in all areas where there may be spill impact? Need to determine a basic policy toward this.
- 93032 Of questionable direct tie in to oil spill damage, otherwise a worthwhile idea.
- 93033 Continuation of good basic research on the heavily impacted harlequin duck. Expensive work at 717K.
- 93034 Pigeon guillemots are a good indicator species and would seem a worthwhile project for long term monitoring. Another possibility for competitive bid

- 93035 A possible indicator species of problems in the intertidal, if 1992 data indicated persistent problems it might be wise to continue this.
- 93036 An expensive but important project that actually tests restoration techniques. Probably best continued by agencies.
- 93038 Important to continue monitoring shorelines, probably best conducted by agencies (as in the past) to provide consistency. Again price seems high (520 K)
- 93039 An important long term study that can be bid out or directed to the University of Alaska (current contractor) Price seems high (507 K)
- 93041 This project is much too vague although some of the basic ideas might have merit. Should be bid out if considered
- 93042 This species was damaged by the spill and is the only cetacean that can be closely monitored by individual year by year. A good indicator species of environmental health. Should be bid out to private to lower costs.
- 93043 Although the detail involved here is good, the cost is excessive. Should be put out to private bid. Will supplement 93045.
- 93045 An important monitoring study that should be continued by the agencies for continuity.
- 93046 Important to continue this study. Better information should have been available on harbor seals before spill. A chance to continue long term data base on harbor seals another important indicator of health of marine environment. Should be done by ADF&G for continuity. Could be reduced in scope to lower budget
- 93047 A worthwhile project but the cost is excessive. There is no reason this could not be bid out to private consulting firms.
- 93050 This project doesn't seem essential and is too expensive
- 93051 Some important components in this study but the cost is excessive (1.2 million) Stream data should be already be available for most part. Study should be pared down and put out to bid. Murrelet data is important

- 93052 Reasonable project but doesn't most of this data exist from previous years of study? Necessary to continue or perhaps just wrap up?
- 93053 This project is a necessary backup for other projects and should be continued by NOAA
- 93057 A reasonable continuing project that should be bid to the private sector
- 93059 A very important project that should be bid out to private groups. There is great public demand for this approach and it is time to get it moving.
- 93060 Another important project that involves agencies and the Nature Conservancy, hopefully this information will end up in a usable format. Disappointed in current format of Nature Conservancy survey.
- 93061 Could be important to habitat eventual habitat protection or simply more agency bureaucracy. Should be started on a small scale and evaluated.
- 93062 An important tool for assembling data.
- 93063 A good project to benefit recovery of chum and pink salmon if it goes beyond this planning phase. Salmon eggs and young were damaged. Could be bid out to private sector.
- 93064 A very important action that is a first step in responding to strong public desire for habitat protection/acquisition. A must fund project that does not go far enough in providing money for habitat acquisition.

To summarize, those projects that were considered good with relevance to the oil spill and/or restoration are (93)002, 003, 007, 010, 012, 022, 030, 033, 034, 036, 038, 039, 042, 043, 045, 046, 047, 053, 057, 060, 061, 062, 063, and 064.

Those projects that are good have good potential but with less relevance are (93)004, 014, 017, 025, 032, 035, 051.

Those projects considered poor are (93)009, 011, 015, 016, 018, 019, 020, 026, 031, 041, 050.

Those projects that are prime candidates for open bid are (93)002, 004, 005, 010, 012, 017, 022, 034, 035, 042, 043, 047, 051, 057, 059, 063.

93323010

Additional Comments:

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EXXON VALDEZ OIL SPILL
TRUSTEE COUNCIL
ADMINISTRATIVE RECORD

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

Dale Starkovich
10589 Chiniak Dr
Kodiak, Alaska 99615



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

Attn: 1993 Draft Work Plan

COMMENTS ON EVOS RESTORATION 1993 DRAFT WORK PLAN

Project Number: 93017
Project Title: Subsistence Restoration Project

A subsistence restoration project involving the communities I am familiar with including Larsen Bay, Karluk, Old harbor, Akhiok, Port Lions, Ouzinkie, Kodiak City, Chignik Lake, Chignik, and Chignik Lagoon should not be undertaken. When the Oil Spill Health Task Force was in Kodiak this spring they identified two areas, Kodiak boat harbor and a location near Old Harbor boat harbor that exhibited high levels of hydrocarbons in shellfish. The EVOS was not responsible for the high hydrocarbon levels at either location. The remaining samples taken from subsistence use areas around the Kodiak Archipelago and Chignik area showed only background levels of hydrocarbons. Extensive testing of shellfish and finfish in areas identified by community residents as traditional subsistence use areas occurred in 1989 and 1990. Those results clearly show bivalves and finfish located in subsistence use areas contain nothing more than background levels of hydrocarbons.

The Oil Spill Health Task Force hydrocarbon testing of smoked fish, which is consumed in large quantities in the villages, showed cancer causing hydrocarbon levels to be extremely high. They were so high they were off the chart!

More testing of subsistence foods is not justified. The result of two years of extensive testing demonstrates there is no health risk involved with consuming subsistence foods in the Kodiak Archipelago and Chignik area as a result of the EVOS.

A tremendous amount of money was spent in this area to collect and test subsistence shellfish and finfish for oil contamination as a result of the EVOS. The results speak for themselves. Spending additional money on this project would be ludicrous.

Mitigation of lost subsistence use by making funds available to communities to support travel to harvest areas away from oiled sites or to areas where resources have not been depleted as well as making funds available to support subsistence food sharing programs between communities is not an appropriate use of oil spill moneys in the Kodiak-Chignik areas. Subsistence foods are safe to eat. Resources have not been depleted. If any money is spent on this project in the Kodiak-Chignik area it will just be another example of the misappropriation and squandering of the oil spill moneys. This money should be used where it will do some good. We know the subsistence foods are safe to eat. Don't waste any more money on duplicating efforts.

Project Number: 93051
Project Title: Habitat Protection Information for Anadromous

Streams and Marbled Murrelets.

The private lands on Afognak Island are being logged at a rapid rate. Soon the entire forest will have been cut and sent to overseas destinations. Other forested areas in the oil spill zone are currently being logged or are scheduled to be logged. The value of anadromous fish produced by streams located on the private lands to commercial, sport, and subsistence users is millions of dollars each year. Identifying the streams is critical. It provides protection to the streams under the State Forest Practices Act. In addition, it is a method to evaluate the lands for possible acquisition. I am in favor of this project.

Marbled murrelets use the old growth forest for nesting and rearing activities. Their habitat on Afognak Island is being destroyed at a rapid rate. Birds should be captured and fitted with radio transmitters to determine their nesting locations on Afognak Island. It is another method to evaluate lands for possible acquisition. I am in favor of this project.

Development of channel typing procedures should be dropped. I can't see what useful purpose it serves.

Thank you for allowing me to comment on these projects.

Sincerely,

Dale M. Starks

93373011
RECEIVED
DEC 08 1992

Comments on The EVOS Restoration 1993 Draft Work Plan

NOV 1992 OIL SPILL
COUNCIL
ADMINISTRATIVE RECORD

Project number: 93019

Project Title: Chugach Region Village Mariculture Project.

I strongly object to this project. EVOS monies were never intended to start small (or large) businesses. This project amounts to an out-right grant to start a mariculture business! Although thinly veiled as a subsistence project it's easy to see what the goal of the project is. This project should not even be in the draft work plan. IT should not even be considered. Please don't waste money on this project. Be responsible!

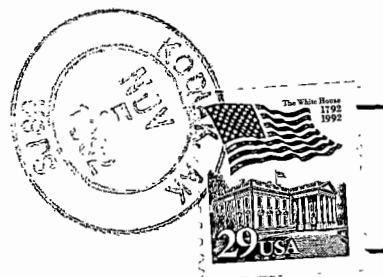
Sincerely

Jeff Barnhart

Additional Comments:

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

JEFF BARNHART
11276 Bells Flat Road
Kodiak, Alaska 99615



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

Attn: 1993 Draft Work Plan

COMMENTS

93323012

RECEIVED

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.

DEC 08 1992
ERSON VALDEZ OIL SPILL
TRUSTEE COUNCIL
ADMINISTRATIVE RECORD

11-4-92

Please include project # 93010
in the 1993 Work Plan. We
must do all that we can
to insure that the Murre
colonies can return to normal
and productive breeding
status. If an education program
does not yield the necessary
results, then strict enforcement
should immediately follow.
This spill has had, and will
continue to have, terrible and
long-lasting consequences and
we must do our very best to
help return the area to its
natural condition at the
earliest opportunity. Thank you
for consideration of my thoughts

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 this project.

Additional Comments:

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

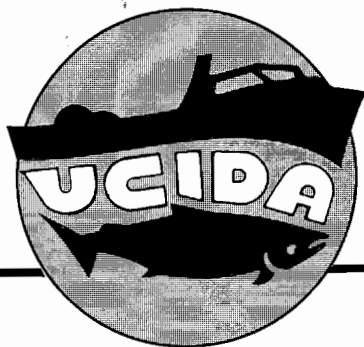
Mary Sinker
32125 Brandstrom Rd
Stanwood WA 98292



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

Attn: 1993 Draft Work Plan





UCIDA

UNITED COOK INLET DRIFT ASSOCIATION

P.O. Box 389 • Kenai, Alaska 99611-0389

(907) 283-3600 • FAX (907) 283-3306

RECEIVED

EXXON VALDEZ OIL SPILL
TRUSTEE COUNCIL
ADMINISTRATIVE RECORD

November 9, 1992

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

Dear Exxon Valdez Trustee Council,

UCIDA appreciates the opportunity to comment on the Exxon Valdez Restoration Draft 1993 Work Plan. Our organization represents the 585 salmon drift permit holders in Upper Cook Inlet. We will therefore limit our comments to the Projects that directly affect the Upper Cook Inlet area.

UCIDA supports Projects 93002, 93012 and 93015. Our concerns and recommendations are as follows:

- 1) We agree with the concept that the funds should be spent in the three oil impacted areas - Prince William Sound, Kodiak and Cook Inlet.
- 2) "Cook Inlet" must be defined to include both Upper and Lower Cook Inlet.
- 3) The Kenai sockeye salmon run could arguably be the fishery resource most impacted by the Exxon Valdez oil spill due to the large over escapement which resulted from the total closure of the drift fishery.
 - A) ADF&G has released test results which would indicate minimal returns to the Kenai River in 1994. The parent year

for the 1994 return is 1989 - the year of the Exxon Valdez oil spill.

B) The Kenai sockeye run is the "backbone" of the Upper Cook Inlet commercial fishery upon which fishermen, processors, cannery workers, transporters and local businesses are very dependent.

4) UCIDA feels that for Upper Cook Inlet it is imperative for the short term that:

A) We protect the impacted resource - Kenai River sockeye salmon.

B) We protect the livelihood of impacted citizens as much as possible without retarding the recovery of the resource.

To help accomplish these goals UCIDA supports projects 93002, 93012 and 93015. Again, we appreciate the opportunity to comment on these projects as well as any future issues regarding the Exxon Valdez oil spill and its effects on Cook Inlet.

Sincerely,

P.M.


Theo Matthews
Administrative Assistant

93323014

November 9, 1992

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

RECEIVED
DEC 08 1992

EXXON VALDEZ OIL SPILL
SETTLEMENT TRUSTEE COUNCIL
ADMINISTRATIVE RECORD

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,

Regina & Bob Christmas

P.O. Box 118

Tatitlek, Alaska

- 99677 -

Reviewed

10/31/97.

Not in Admin Record or Pub. Rec.

- Need numbers (#) assigned
- Copies (with #'s) for Pub Rec
- Originals [letterhead, signatures, hand-written] for Admin rec.

Parvis A. Tribley
P.O. Box 240181
Anchorage, Alaska 99503

93323015
RECEIVED
DEC 08 1992

November 15, 1992

EVOS Trustee Council
645 G Street
Anchorage, Alaska 99501

EVYON VALDEZ OIL SPILL
TRUSTEE COUNCIL
ADMINISTRATIVE RECORD

Re: Comments to 1993 Draft Work Plan

I have reviewed the 1993 Draft Work Plan. While I realize it is too early to discuss any definitive land acquisition projects, I have a concern which I have not heard the Trustee Council address.

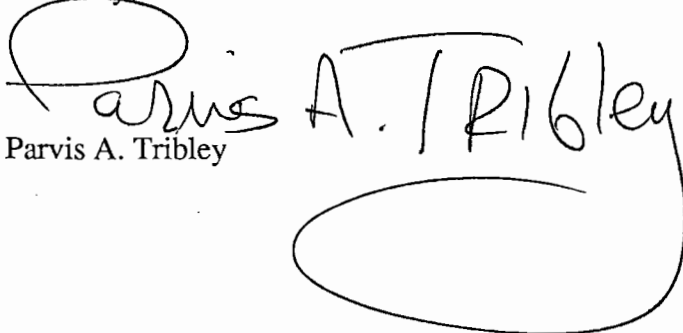
Much of the present day shoreline in Prince William Sound was tideland before the 1964 earthquake. Under the property law concept of "avulsion," ownership of "avulsed" land does not change after the causal event. Thus, these former tidelands, now shorelands, remain in the ownership of the State of Alaska. As former tidelands, these lands retain their "public trust" status.

Talk of land management and acquisition in Prince William Sound often includes discussion of treatment of the Forest Service land, Native land and private land owners. However, these discussions are generally void of any reference to the fact that most, if not all riparian and littoral interests in the Sound involve these avulsed lands which are owned by the State and not these other parties. This concept needs to be understood by all Trustee Council members and incorporated into all land use planning and acquisition decisions which are to be undertaken with these trust funds.

Before this trust money is spent acquiring access or protecting coastal lands, the Council should make sure that they are not buying lands which are already subject to public trust. Also, the Council should make sure that the proper governmental branch manages these lands (what authority does the U.S.F.S. have to manage State owned trust lands?).

Good luck with the Work Plan.

Sincerely,


Parvis A. Tribley

Akhiok-Kaguyak, Inc.
5028 Mills Drive
Anchorage, AK 99508

93323016
RECEIVED
DEC 08 1992

EXXON VALDEZ OIL SPILL
TRUSTEE COUNCIL
ADMINISTRATIVE RECORD

November 15, 1992

Exxon Valdez Trustee Council
Attn: Mark Roberson
645 "G" Street
Anchorage, AK 99501

Dear Sirs:

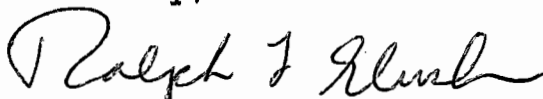
This letter is to inform the Trustee Council of an omission in its listing of "1993 Public Proposals for Habitat Acquisition - Table 1, 09/08/92."

Among the several project listings regarding Kodiak Island and Kodiak Refuge inholdings, the Akhiok-Kaguyak, Inc. (AKI) should be listed as a willing seller in the 'Proponent' column.

AKI's lands have been estimated by the U.S. Department of Interior to have a value in the \$72 million range, hence this figure could be inserted in the chart under 'Cost Millions.'

Thank you for your attention to this matter. AKI looks forward to cooperating with the Trustee Council as your important work progresses.

Sincerely,



Ralph Eluska
Akhiok-Kaguyak, Inc.

Exxon Valdez Oil Spill Trustee Council

Table 1 1993 PUBLIC PROPOSALS FOR HABITAT ACQUISITION

09/06/92

PROJECT	PROPOSITOR	COST ² \$MILLIONS
Kachemak State Park inholdings	Seldovia Native Association *	22.0
Kachemak State Park inholdings	Kachemak Bay Citizens Coalition	22.0
North Afognak Island	Jerome Selby	84.0
Afognak Island	Afognak Native Corporation *	113.5
Shuyak Island <i>private inholdings</i>	Jerome Selby	0.2
Kodiak Island Borough/State land exchange, acquisition of recreation sites on Kodiak	Kodiak State Parks Citizens' Advisory Board	0.07
Kodiak Refuge inholdings	World Wildlife Fund	None provided
Kodiak Refuge inholdings	Jerome Selby	45.0
Kodiak Island	Old Harbor Native Corp. *	50.0
Kodiak Refuge inholdings	Koniag, Inc. *	77.4
Kodiak weirs/watersheds	ADF&G, FRED	3.0
Kodiak Refuge stream mouths <i>Active Dredgments</i>	Jerome Selby	9.0
Kodiak recreation sites <i>Land System</i>	Jerome Selby	5.0
Afognak I., Cape Suckling, Kachemak Bay, Kenai Fjords, Kodiak Refuge, PWS	Alaska Center for Environment	None provided ?
Archeological sites	DNR, DPOR	0.235
Recreational lands	DNR, DPOR	2.5
Olsen Bay watershed	Jack Helle	None provided
TOTAL COST, WILLING SELLERS		262.9
TOTAL COST, OTHER PROPONENTS		171.1
TOTAL COST, WILLING SELLERS PLUS OTHER PROPONENTS (Kachemak State Park inholdings (\$22.0) count once)		412.0

1. [*] denotes willing seller

2. Proponent estimated cost



DEPARTMENT OF ECOLOGY AND
EVOLUTIONARY BIOLOGY
SCHOOL OF BIOLOGICAL SCIENCES

IRVINE, CALIFORNIA 92717

FAX (714) 725-2181

DEC 08 1992

EXXON VALDEZ OIL SPILL
TRUSTEE COUNCIL
ADMINISTRATIVE RECORD

November 4, 1992

Draft 1993 Work-Plan Comments
Exxon Valdez Trustee Council
645 "G" Street
Anchorage, Alaska 99501

Dear Council Members:

I am a past member of the Damage Assessment Peer-Review group and have been asked to serve as a future peer-reviewer for the Restoration program. My expertise is in marine ornithology and biological oceanography. I have taken the time to examine the 1993 Draft Work Plan as a concerned scientist because it has yet to be sent to me for examination through the peer-review process.

A major concern of mine is that to date I know of no overall integrated assessment of damages, no long-term integrated view of possible restoration options and no examination of the potential for adverse interactions as restoration efforts directed at one species cause problems for another. I provide two hypothetical examples. First, there have been several suggestions for enhancing salmonid access to streams by building weirs or ladders around waterfalls (Project 93063 appears to be for gathering data appropriate for deciding which streams would be appropriate). In New Zealand, evidence has been obtained showing that salmonids compete with stream breeding Blue Ducks for insect larvae. Harlequin Ducks in Prince William Sound generally nest on portions of streams unavailable to salmonids. It is possible that Harlequin Ducks would cease to breed successfully on these streams due to competition for larval insects if salmonids had access to the pools used by very young ducks. Secondly, there have been and are many projects suggested for enhancement of salmon production (e.g. 93016, 93032, 93063). Some populations of pink salmon have produced smaller adults in recent years possibly due to competition for marine resources. In addition, since adult salmon may compete with marine birds and mammals for small forage fishes and large zooplankton, it is possible that pre-spill declines in marine birds and mammals may have been related to foraging competition with growing populations of salmon. The further enhancement of salmon numbers as part of the restoration process may adversely impact populations of birds and mammals that are also candidates for restoration. The validity of these hypotheses is not known, but I present them as an illustration of the complex interactions that may influence our efforts at restoring the damaged marine ecosystem. We need an integrated, overall assessment of injury and restoration options before we embark

on most projects. With the exception of some monitoring and damage assessment projects, waiting until a well integrated long-term program is thought-out is likely to be beneficial.

I have examined the recommendations of the chief scientist as to the merits of funding of various proposed work. I am in general agreement with his recommendations with the following minor exceptions.

93006	3	If archeological sites were hit by oil, they must have been in a supra-tidal or intertidal zone in which wave action was eroding the site. Sites exposed to erosion occur throughout the coastal United States and money spent cleaning these sites would not reverse these natural losses.
93007	3	See Above
93008	3	See Above
93011	4	There is little pre-spill data on hunting of harlequin ducks, so "study" seems superfluous. A simple closure of hunting of harlequins in PWS could be done while populations recover without spending on dubious studies.
93016	3	Further enhancement of salmon stocks may have negative impacts on other portions of the marine ecosystem.
93018	4	
93033	2-3	This seems to be a project that is growing in size and cost. It could be useful to focus on how the information gathered can actually be used for restoration. What are the possible restoration activities that could be undertaken?
93034	4	It is not clear how the data from this study would be used to aid restoration.
93036	1	For the restoration of mussel beds and the protection and restoration of the many

species of organisms dependent on mussel beds, it is important we learn what contamination persists and how to remove it.

93045

1

This is an important effort that will be most useful if we have a continuous time series. It is our best means of determining if restoration efforts in the near-shore environment are having a desired effect.

93048

Missing from my volume.

I look forward to seeing the development of a long-term plan.

Sincerely,

A handwritten signature in cursive script, appearing to read "George L. Hunt, Jr.", written in dark ink.

George L. Hunt, Jr.
Professor

GLC/np



HOMER SOCIETY OF NATURAL HISTORY

PRATT MUSEUM

3779 Bartlett Street
Homer, Alaska 99603

(907)235-8635



EXXON VALDEZ OIL SPILL
TRUSTEE COUNCIL
ADMINISTRATIVE RECORD

MEMORANDUM

DATE: November 6, 1992

TO: Exxon Valdez Trustee Council
645 "G" Street
Anchorage, AK 99501

FROM: Board of Directors, Homer Society of Natural History *[Signature]*

RE: Draft 1993 Work Plan Comments

The Homer Society of Natural History represents over 800 individual, family, and business members primarily in the southern Kenai Peninsula, an area hit by the Exxon Valdez oil spill in 1989. Our principal function is operation of the Pratt Museum in Homer.

We are very much aware of the impacts on the environment created by the oil spill as we mounted a factual exhibit on all aspects of the spill in our museum immediately after the spill and subsequently constructed a traveling exhibit that is now touring museums and science centers around the lower 48 states for a least the next three years. The traveling exhibit has received national acclaim for its thoroughness and impartiality in dealing with a very complex and controversial issue. It was featured at the Smithsonian Institution in Washington DC last spring and has been used as a model of traveling exhibits by national museum organizations. Although we have tried to schedule the traveling exhibit in Alaska, there is considerable reluctance on the part of state funded museums to host the exhibit because of the fear of financial retribution by oil related interests. Nevertheless, we feel it is very important to better inform and educate the Alaskan public about the problems of oil transportation in the marine environment, and our exhibit is already set up to do this.

All of the projects proposed for action in the draft 1993 work plan are to be funded through state and federal agencies. We believe that there is a substantial cadre of talent in private, non-profit, and other educational and scientific organizations outside of government which should be allowed to bid on these projects. The result would be a competitive bidding situation where the best talent and expertise would do the work at the best price. In our case, there are several educational projects that we feel we could accomplish with far greater efficiency than the agencies proposing them. Project 93009 includes activities, many of which we have already completed: development of an oil spill exhibit, construction of scientific educational activity kits for the marine environment in relation to oil, and formulation of

school curricula used by teachers in public schools. Why repeat this process at a cost of \$316,000? Other projects involving archaeological assessments or basic data gathering on species populations may best be accomplished by museums and university scientists. Management oriented research and routine monitoring of populations are the responsibility of government agencies.

We believe that some of the funds should be set aside as an endowment with the income generated used for long term monitoring of species populations. We do not know what the pre-spill population levels were of many species hit by the spill. If we can monitor these populations after the spill for a long enough period of time, we may be able to establish a base line that will serve to measure the impact of future environmental disasters. In this regard, we support the initiative of Senator Arliss Sturgulewski in her Proposed Restoration Option dated 24 August 1992.

We also believe that a portion of the funds must be used to acquire property that would aid in the long term replacement of resources damaged by the oil spill. Purchase of seabird colonies now in private ownership for management by the Fish and Wildlife Service, for example, would increase the probability of more rapid increase and sustainment of seabird populations in the oil spill area. One example is Gull Island in Kachemak Bay, a colony of over 5,000 Common Murres and about 6,000 other seabirds, now owned by the Seldovia Native Association. Other lands to purchase for protection of damaged species are uplands ready to be logged, that if logged would further impact nesting Marbled Murrelets, Bald Eagles, and Harlequin Ducks (among other species). The best example is the Seldovia Native Association land in Kachemak Bay State Park.

In summary, we believe that: 1) The procedure for preparing annual work plans for research and education on the oil spill should include a competitive bidding process open to all qualified scientific and educational organizations and not be restricted to government agencies; 2) A portion of the settlement funds should be placed in an endowment specifically to follow long term changes in populations impacted by the spill, to continue to provide updated information to the public through exhibits and educational programs both in museums and public schools, and to accrue funds to purchase properties that become threatened which support populations of species impacted by the spill; and 3) A portion of the settlement funds must be used now to purchase property that is under immediate threat of timber removal or other development that would result in further damage to species already impacted by the Exxon Valdez oil spill.

Homer Society of Natural History Board of Directors: Chuck Jay, George West, Hazel Heath, Cathie Ulmer, Sara Peterson, Mike Cline, Carol Swartz, Margret Pate, Marie Walker



S.O.S. TEAM

93323019

P.O. Box 194, Seldovia, AK 99663
(907) 234-7400 Fax (907) 234-7699

RECEIVED
DEC 08 1992

November 12, 1992

EVOSTC
1993 Workplan Comments
645 G Street
Anchorage, AK 99501

EXXON VALDEZ OIL SPILL
TRUSTEE COUNCIL
ADMINISTRATIVE RECORD

RE: 1993 EVOSTC Workplan (Draft)

The SOS Team of Seldovia is a volunteer response group set up according to legislation as a result of the EXXON spill. We have membership from Anchorage to Nanwalek, volunteers willing to respond to an oil spill in Cook Inlet or Prince William Sound. From this viewpoint, the settlement funds would be best spent in programs dealing with prevention, improving clean-up and response, and baseline monitoring. Unfortunately, the 1993 workplan is heavily loaded with fish and wildlife enhancement or research, much of it questionable in value. Even the Chief Scientist's critique identifies 12 of the workplan's 43 projects as unrelated to recovery or considered inappropriate. This is a gross misuse of these funds!

While Prince William Sound has been lavished in possibly the world's finest prevention/response system, Cook Inlet remains largely ignored. Tankers plying these waters are unescorted, response equipment needs remain a high priority, and the Inlet oil producers and shippers are not able to provide for these demands from their marginal operations. A proportion of the settlement funds can be, and should be used for Cook Inlet prevention, response, and monitoring. With the proper funding SOS-type response groups operating with CISPRI (Cook Inlet RAC) could exist in several Inlet towns and on Kodiak. On-site equipment could be stationed, people trained, and the fears and distrust of many citizens would be somewhat diffused.

The SOS Team does support appropriate fish and wildlife research and enhancement. However, we also believe settlement funds need to be awarded for escort vessels, monitoring programs, and particularly local response depots. We would gladly furnish you with more information about our organization and how depots could be established and maintained.

Sincerely,

SOS Team Board of Directors

93323020

11-13-92

Chenega Bay AK. 99574

Exxon Valley oil spill Public Information

645 "G" Street

Anchorage, AK 99501

RECEIVED

DEC 08 1992

EXXON VALDEZ OIL SPILL
TRUSTEE COUNCIL
ADMINISTRATIVE RECORD

Dear Trustee Council member:

I live in Chenega Bay. Our Village was most heavily impacted out of the region. 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) and the Bivalve shellfish hatchery and research center (93030) 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 Prince William Sound (93017) & Chenega Chinook & Coho Salmon release program (93016)

Sincerely

John M. Tolmoff

PO Box 8071

Chenega Bay AK 99574

93324021
RECEIVED
 DEC 08 1992

To: Exxon Valdez Oil Spill Trustee Council
 645 G Street
 Anchorage, Alaska 99501
 Attn: Dave Gibbons

EXXON VALDEZ OIL SPILL
 TRUSTEE COUNCIL
 ADMINISTRATIVE RECORD

From: Susan W. Springer
 P.O. Box 257
 Seldovia, Alaska 99663

Re: Public Comments Regarding the 1993 Draft Work Plan for the EVOS
 Criminal Settlement Funds

I have reviewed the 1993 Draft Work Plan and am left with some strong feelings about the direction in which the Restoration Team is headed.

First, although these funds are to benefit and compensate the people of Alaska for resources and habitat destroyed or damaged, it appears as though one of the immediate beneficiaries are state and federal agency bureaucracies. The logic is put forth that projects shall be administered through various state and federal agencies **since they already have organizations in place to handle such activities.** Therefore why is it necessary to allow each agency to skim an average of ten percent off the top of each project budget for General Administration. The public does not wish those funds to feed the bureaucracy of state and federal agencies. I would challenge each agency to conduct these projects, scale and scope unchanged, with no "windfall" funds for General Administration. The 1.2 million hence saved would fund programs I shall address presently.

When reviewing the proposed projects, I read carefully the comments of the Chief Scientist. While I support the Restoration Team in their "veto" of the seven projects listed on page three of the budget summary (noting that project nos. 93019 and 93026 stand out in particular as frivolous and ill-directed), there are an additional twelve projects that should be deleted and two whose scope and budget should be reduced. Under the criminal restitution spending guidelines, these projects are not justified:

93004	93009	93011	93018	93024
93025	93029	93032	93034	93035
93043	93063			

Project nos. 93046 and 93051 are not justified with their present scope and budget. Total savings exceed 2.5 million.

In looking at the 1993 Draft Work Plan and comparing it to the criminal restitution spending guidelines, a character of the document emerges which is severely biased in favor of items 1) and 2) under Article Three: "Restoration, Replacement and Enhancement of Affected Resources...Acquisition of Equivalent Resources and Services". Item 3) "Long Term Environmental Monitoring and Research Programs Directed to the Prevention, Containment, Cleanup, and Amelioration of Oil Spills." by number and scope of projects is comparatively neglected.

I would ask the Trustee Council to solicit project proposals from coastal municipalities in the spill affected area ,regarding creation of nearshore response teams modeled after the SOS Team in Seldovia. The Seldovia Team is made up of volunteers, primarily fishermen, who have been trained in the Incident Command system, Hazmat, First Aid, and numerous methods of oil spill response and cleanup, including boom deployment. These people are motivated not by the dollars a project can add to their organization nor the positions that can be created, but by a simple desire to protect the resources from which they take their livelihoods. Unlike agency technicians, they work these waters and coastline year in and year out and they have the local knowledge of marine conditions. In the "long term environmental monitoring and research programs directed to the prevention, containment, cleanup, and amelioration of oil spills" , **these people and those like them in other coastal communities have expertise which is valuable and should not be ignored.**

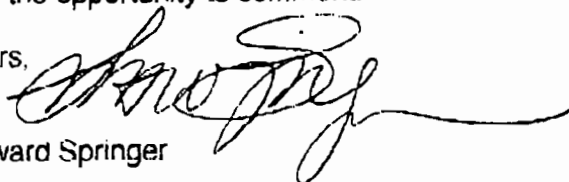
It would make sense for the appropriate agency to team up with coastal municipalities or fishermen's organizations to create SOS teams, and to use these local experts in projects that satisfy the requirements of Article three, item three, of the spending guidelines. This will go a long way in preparing us to deal with future oil spills.

The Trustee Council should bear in mind that as you decide how these funds are to be spent you must act not as representatives of the state and federal agencies who employ you, but as entrusted spokesmen for the people of Alaska. We are counting on you to be ethical and balanced in your decisions.

Thank you for the opportunity to comment.

Very truly yours,

Susan Woodward Springer



Copy faxed to you
11-18-92 230PM

To: Exxon Valdez Oil Spill Trustee Council
645 G Street
Anchorage, Alaska 99501
Attn: Dave Gibbons

From: Susan W. Springer
P.O. Box 257
Seldovia, Alaska 99663

Re: Public Comments Regarding the 1993 Draft Work Plan for the EVOS
Criminal Settlement Funds

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Copy faxed to you
11-18-92 230PM

To: Exxon Valdez Oil Spill Trustee Council
645 G Street
Anchorage, Alaska 99501
Attn: Dave Gibbons

From: Susan W. Springer
P.O. Box 257
Seldovia, Alaska 99663

Re: Public Comments Regarding the 1993 Draft Work Plan for the EVOS
Criminal Settlement Funds

I have reviewed the 1993 Draft Work Plan and am left with some strong feelings about the direction in which the Restoration Team is headed.

First, although these funds are to benefit and compensate the people of Alaska for resources and habitat destroyed or damaged, it appears as though one of the immediate beneficiaries are state and federal agency bureaucracies. The logic is put forth that projects shall be administered through various state and federal agencies **since they already have organizations in place to handle such activities.** Therefore why is it necessary to allow each agency to skim an average of ten percent off the top of each project budget for General Administration. The public does not wish these funds to feed the bureaucracy of state and federal agencies. I would challenge each agency to conduct these projects, scale and scope unchanged, with no "windfall" funds for General Administration. The 1.2 million hence saved would fund programs I shall address presently.

When reviewing the proposed projects, I read carefully the comments of the Chief Scientist. While I support the Restoration Team in their "veto" of the seven projects listed on page three of the budget summary (noting that project nos. 93019 and 93026 stand out in particular as frivolous and ill-directed), there are an additional twelve projects that should be deleted and two whose scope and budget should be reduced. Under the criminal restitution spending guidelines, these projects are not justified:

93004	93009	93011	93018	93024
93025	93029	93032	93034	93035
93043	93063			

Project nos. 93046 and 93051 are not justified with their present scope and budget. Total savings exceed 2.5 million.

In looking at the 1993 Draft Work Plan and comparing it to the criminal restitution spending guidelines, a character of the document emerges which is severely biased in favor of items 1) and 2) under Article Three: "Restoration, Replacement and Enhancement of Affected Resources...Acquisition of Equivalent Resources and Services". Item 3) "Long Term Environmental Monitoring and Research Programs Directed to the Prevention, Containment, Cleanup, and Amelioration of Oil Spills." by number and scope of projects is comparatively neglected.



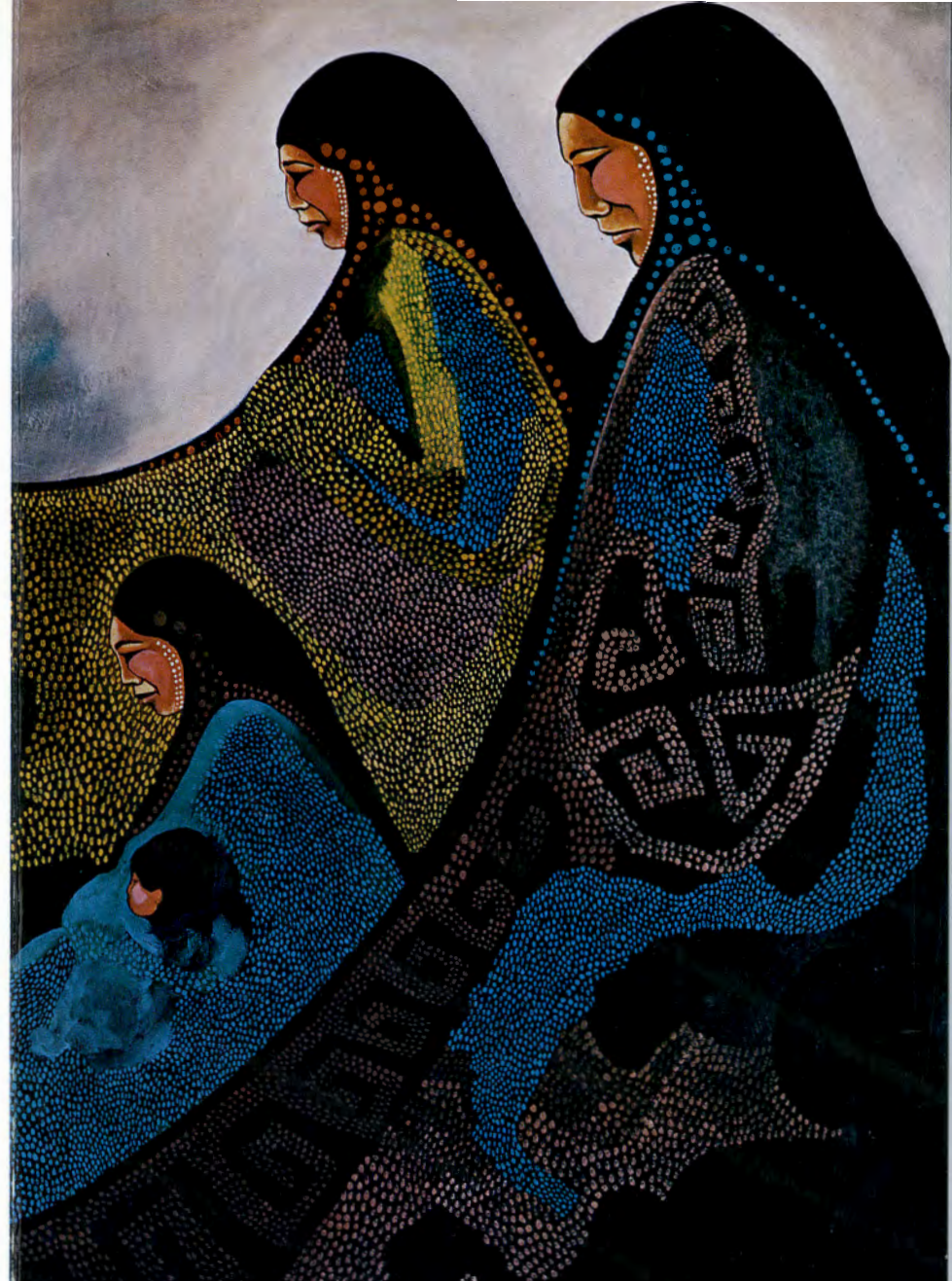
In Search for a New Tomorrow represents the Cherokee women on the Trail of Tears who faced hardships but endured. Some women lost their husbands but had to continue with little children until they reached the New Indian Territory in Oklahoma, 1835. (Cherokee) The card is a reproduction of an oil painting by Dorothy Strait, © 1992. All rights reserved.

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Exxon Valdez Oil Spill Trustees

645 G Street

Anchorage, Alaska 99501

I was glad to see a few of the projects suggested are not recommended. The Ft. Richardson, really takes the cake doesn't it? In looking over the Draft work Plan, I really feel like I'm looking at Christmas - that is if I worked for Fish & Game or Fish & Wildlife why are we fattening ^{the} budgets like this. No matter how much - or how little money they have - they have NEVER had the money to do studies to help understand where the crabs have gone, where the shrimp have

gone - etc. Money and willingness are two totally different things.

I hope, in your wisdom gained from listening to testimony, you will fund fully the money now needed for the buy back of Kachemac State Park in 1993.

Thank you —

Joy Post

Box 1075

Homer, Alaska 99603

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EXXON VALDEZ OIL SPILL
TRUSTEE COUNCIL
ADMINISTRATIVE RESPONSE

93324022

93324023

DENNIS P. ANAHONAK
P.O.B. 5535
PORT GRAHAM, AK. 99603-5535
11/18/1992

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DEC 08 1992

EXXON VALDEZ OIL SPILL PUBLIC INFORMATION CENTER
645 "G" STREET
ANCHORAGE, AK. 99501

EXXON VALDEZ OIL SPILL
TRUSTEE COUNCIL
ADMINISTRATIVE RECORD

DEAR TRUSTEE COUNCIL MEMBER;

I AM WRITING TO YOU REGARDING TRADITIONAL SUBSISTANCE HARVEST AREAS WHICH WERE DESTROYED BY THE OIL SPILL AT WINDY BAY. 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 FROM WINDY BAY TO THE CROME MINE AT PORT CHATHAM, AND FEEL THAT A RESTORATION PROGRAM AT DOGFISH BAY AND PASSAGE ISLAND INWARD OF PORT GRAHAM BAY & NANWALEK, SHOULD BE PURSUED. REPLANTING AND GATHERING OF COCKLES FROM BEAR COVER, RESTOREATION OF MUSSELS AND CHITONS KILLED IN PORT GRAHAM.

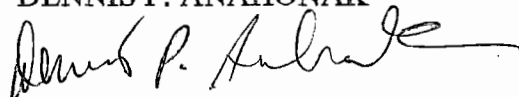
I WOULD LIKE TO POINT OUT THAT MARICULTURE RESEARCH AND DEVELOPMENT PROGRAMS THAT NOW NEED SUPPORT, COULD HELP A GREAT DEAL IN FUTURE RESTORATION, IN THE EVENT OF FUTURE OIL SPILLS.

PLEASE CONSIDER OUR PROPOSAL, BECAUSE WE WOULD LIKE TO HELP OUR VILLAGE BY PROVIDING JOB OPPORTUNITIES, SUBSISTANCE FOODS "TRADITIONAL", AND ECONOMIC DEVELOPMENT FOR OUR RESIDENTS. NOT TO MENTION, RESEARCH AND DEVELOPMENT THAT THESE PROGRAMS COULD PROVIDE, FOR FUTURE RESTORATION, HERE AND ABROAD/ WORLD WIDE CONSULTING FOR OIL SPILL RESTORATION.

WE ALSO SUPPORT THE FOLLOWING PROJECTS; CHUGACH REGION MARICULTURE PROJECT {93019}, THE BIVALVE SHELLFISH HATCHERY AND RESEARCH CENTER {93020}, SUBSISTENCE RESTORATION PROJECT {93017}; HABITAT USE, BEHAVIOR, & MONITORING OF HARBOR SEALS IN PRINCE WILLIAM SOUND {93046}, AND THE CHENEGA BAY CHINOOK AND COHO SALMON RELEASE PROGRAM {93016}.

THE PEOPLE OF THE CHUGACH REGION ARE ALL WORKING FOR OUR PROJECTS TO BE SELF-SUSTAINING AND ARE COUNTING ON THIS MONEY TO REACH THIS THESE OBJECTIVES. WE URGE YOU TO HELP SUPPORT OUR PROJECTS.

SINCERLY, DENNIS P. ANAHONAK



93324024

ISAAC MOONIN
P.O.B. 5523
PORT GRAHAM, AK. 99603-5523
11/16/1992

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645 "G" STREET
ANCHORAGE, AK. 99501

EXXON VALDEZ OIL SPILL
TRUSTEE COUNCIL
ADMINISTRATIVE RECORD

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Isaac Moonin

SINCERLY, ISAAC MOONIN.

November 18, 1992

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DEC 08 1992

Exxon Valdez Oil Spill Public Information Center

645 "G" Street

Anchorage, Alaska 99501

EXXON VALDEZ OIL SPILL
TRUSTEE COUNCIL
ADMINISTRATIVE RECORD

Dear Trustee Council Member;

I am writing to you regarding some traditional subsistence areas which were destroyed by the oil spill at Windy Bay. 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 and would like to pursue clam restoration at Dog Fish & Passage Island which is located between Fort Graham and Nanwalek.

Please consider our proposal because we would like to help our Village by providing job opportunities, subsistence foods, and economic development to our residents.

We also support the following projects: Chugach Region Mariculture Project, The Bivalve Shellfish Hatchery and Research Center (93020), Habitat Use, Behavior, & Monitoring of Herring Seals in Prince William Sound (93046), & Chenega Bay Chinook and Coho Salmon Release Program (93016).

The people of the Chugach Region are all working for our projects to be self-sustaining and are counting on this money to reach this point. We urge you to help support our projects.

Sincerely,

Dana L. Moom