

B
EIS

2009 Belmont Road NW, #403
Washington, DC 20009

29 January 1994

Mr. Rod Kuhn
EIS Project Manager
645 G Street
Anchorage, AK 99501

RE: EIS for the Restoration Plan for the Exxon Valdez Oil Spill
Area - Consider Acquisition of Habitat in Kodiak NWR

Dear Mr. Kuhn:

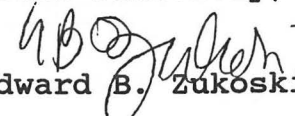
I urge you strongly to consider in the draft environmental impact statement for the restoration plan for the Exxon Valdez oil spill area the purchase of in-holdings in the Kodiak Island National Wildlife Refuge. It is my understanding that native individuals and native corporations hope to sell their in-holdings. They would prefer to sell to the federal government to preserve the area in its wilderness state. If they cannot sell to the government, they likely will sell to development interests. The latter would severely harm wildlife habitat on Kodiak, especially that of the Kodiak brown bear. I believe that federal resource protection agencies would obtain an excellent return on the investment -- high "bang for the buck" -- given the relatively pristine nature of the habitat on Kodiak, and the magnitude of threatened development.

Therefore, as part of its discussion of habitat and acquisition, I urge the Forest Service to consider the alternative of purchasing these in-holdings.

In addition, I request that I be placed on the mailing list to receive any subsequent notices or publications concerning this EIS, as well as the draft and final EISs themselves.

Thank you for your kind attention to this matter.

Yours sincerely,


Edward B. Zukoski

cc: The Hon. George Frampton, Asst. Secretary for Fish Wildlife
and Parks, U.S. Department of the Interior, Washington, D.C.

B
EIS

Telephone Communication -- March 17, 1994
From Stan Stephens (to Nancy Swanton)

Stan Stephens
P.O. Box 1297
Valdez, AK 99686
Tel: 835-4731 (day)
835-2700 (eve)

Received the scoping newsletter. Said he also planned to respond in writing, but he wanted to call to convey the following:

- o While he thinks the project is a good one, he is totally against the use of EVOS restoration funds being used to pay for it. There are greater needs to which these funds could be put to use. These funds should be directed "right to the heart of the problem."
- o Examples of areas where restoration funds could be spent more wisely:
 - 1. Need to start looking at ways to restore the lifestyle of villages damaged by the spill. Not enough has been done to address the damage done by the spill to the social structure of villages such as Chenega.
 - a. Can the ecosystem be enhanced by introducing animals from other locations?
 - b. Clean up the mussel areas that are continuing to pollute and to cause problems for the animals and people who depend on them.
 - 2. Acquire habitat for bird life, particularly migratory species to ensure they have a place to return to, given the stresses they already experience along the flyway.

NOTE: I told Mr. Stephens I also would pass this information along to Rod Kuhn, Project Manager for the Restoration Plan EIS.

--Nancy Swanton

↑ Rod-FYI



United States Department of the Interior



MINERALS MANAGEMENT SERVICE
Alaska Outer Continental Shelf Region
949 E. 36th Avenue, Room 110 Anchorage, AK 99508-4302

FAX TRANSMITTAL SHEET

To: Rod Kuhn

Date: March 22, 1994

Time: 7:30 Am

No. of Pages: 2

(including this page)

Agency/ Company: USDA Forest Service

City/State: Anchorage, AK

Telefax No.: 274-7178

Sent By: Cathy McFarland

Please Confirm receipt of this telefax
with above person at (907) 271-6080.

From: Nancy Swanton

Minerals Management Service
Leasing and Environment Office
949 East 36th Avenue, Room 603
Anchorage, Alaska 99508-4302
(907) 271-6622.

Telefax No.: (907) 271-6507.

Message:

For your information. Ref: Restoration Plan
EIS.

Restoration Planning Working Group
EXXON VALDEZ OIL SPILL RESTORATION OFFICE
645 "G" Street Anchorage, Alaska 99501

SUMMARY OF ALTERNATIVES: ANALYSIS OF PUBLIC COMMENTS

This paper describes the sources of public comment on alternatives for the Restoration Plan, objectives for analyzing them, and a method of analysis. Attached to this paper is a proposed database design.

SOURCES OF PUBLIC COMMENT

In April 1993, we distributed over 28,000 copies of a brochure on alternatives and held 22 public meetings. The brochure contained a one-page questionnaire. It was mailed to a large mailing list inside and outside the state, inserted into local newspapers in some communities in the spill area, put in all post office boxes in small communities, and made available at local post offices and legislative information offices. In addition, about 3,000 individuals on the mailing list will receive a follow-up letter from the Trustee Council encouraging them to submit their comments and enclosing another copy of the brochure.

There are five major sources of comment:

- Synopses of verbal comments made at 22 public meetings, as recorded by notetakers.
- Responses to the questionnaire in the brochure. Over 400 brochure questionnaires have been returned. We expect over 600 by the time the comment period closes.
- Letters.
- Verbal comments received on our toll-free telephone line and recorded by staff.
- Comments on other Trustee Council documents, e.g., some comments on the '94 work plan addressed endowment, an issue to be decided in the Restoration Plan.

These comments reflect the views of those who attended public meetings, submitted questionnaires, and sent letters. Because the process for gathering comments was not based on a statistically valid sample of any of the populations represented, they do not accurately represent the views of these populations as a whole.

OBJECTIVE

The objectives of the analysis of public comment on alternatives is to give the Trustee Council the information they need to make major policy decisions about the draft Restoration Plan and to assure those who commented that we heard their concerns.

REPORTS

The Restoration Planning Work Group agrees on the content of the Summary of Public Comments. However, we disagree about whether the administrative record would also be released as a report. The administrative record consists of the original letters, completed questionnaires, meeting transcripts, and transcripts of phoned-in comments, as well as the database used to analyze these comments. Some RPWG members believe that only the summary should be produced as a report; others believe that the original comments should be provided upon request because they present the comments in context (in fact, the public meeting transcripts have already been given to the Trustee Council); still others believe that the Trustee Council should receive the database containing all comments sorted by topic. We intend to reach a decision on this issue by mid-August.

*Are public
cc cons.
24-10-11
seems they
sympathetic*

The introduction to the Summary of Public Comments would describe the methods of gathering and analyzing public comments. Under each heading we would describe the issue, summarize areas of strong agreement or disagreement, and reproduce "quotable quotes" from the comments themselves. The questionnaire would be reproduced in the appendix.

The structure of the questionnaire would guide the organization of the Summary of Public Comments. It would consist of four sections: 1) issues and policies, 2) restoration categories, 3) spending, and a new topic, 4) process. Most comments fall into one of these categories and should be discussed under that label whether or not they were offered as responses to the questionnaire. For example, comments about spill preparedness should be included under restoration categories; comments about continuing oiling should be addressed under issues and policies (injuries addressed).

The Summary of Public Comments will convey **strong trends** in opinions expressed by "stakeholders" (e.g., individuals living in the spill area, corporations or national environmental groups). Consequently, in our analysis we will look for areas of strong agreement or disagreement. We will use numbers of responses and percentages only to document strong trends. For example, we may report, "Based on 300 responses we received from the spill area, most (70%) preferred allocating funds to the spill area only." However, if the tabulation revealed that, for example, 55% of the responses within the spill area preferred ecosystem monitoring and 45% did not, we would report that the results were mixed; we would not report percentages because they do not reflect strong trends.

METHOD OF ANALYSIS

1. Develop a list of "stakeholders" in this process. One stakeholder would be the general public; another might be national environmental groups.
 2. Tabulate responses to all multiple-choice questions by stakeholder. Responses from one of the stakeholders -- the general public -- would be reported by the following regions:
- national business
agencies
universities
1000
11208*

- a. Within the spill area
 - 1) Prince William Sound
 - 2) Kenai
 - 3) Kodiak/Alaska Peninsula
- b. Outside the spill area
 - 1) Alaska
 - 2) Outside Alaska
- c. Location unknown

Example 1 illustrates this approach as it would be applied to the first policy question asked in the brochure. All figures are hypothetical.

EXAMPLE 1

Question: Should restoration actions address all injured resources and services, or all except those biological resources whose populations did not measurable decline because of the spill?	ALL	GENERAL PUBLIC						NAT'L ENV GROUPS
		WITHIN SPILL AREA			OUTSIDE SPILL AREA		UNK	
		PWS	Kenai	Kod/AP	Alaska	Outside		
Number of responses	400	100	100	80	40	40	20	20
% of total responses	100%	25%	25%	20%	10%	10%	5%	5%
Response								
Target injured resources & services	72%	85%	70%	90%	47%	63%	60%	25%
Target population declines	25%	10%	20%	8%	50%	22%	40%	75%
No preference	3%	5%	10%	2%	3%	15%	0	0
Total	100%	100%	100%	100%	100%	100%	100%	100%

3. Code open-ended comments, e.g., those reflecting a certain viewpoint or expressing a certain concern. Tabulate the frequency of certain comments by "stakeholder", as was done for multiple-choice questions.
4. In the Summary of Public Comments, report areas of strong agreement or disagreement by stakeholder and, for the general public, by region. Using Example 1, we might report that of the 400 responses to multiple-choice questions, nearly three-quarters (72%) favored addressing all injured resources and services. This trend held for all but one group. Most of the 20 responses received from national environmental groups favored targeting resources whose populations declined because of the spill. Furthermore, we might report that of 100 people who submitted open-ended comments on injuries to be addressed by restoration, two-thirds believed that our damage assessment information was flawed because it was

driven by the lawsuit and therefore did not study all of the right species.

5. In the Summary of Public Comment, we would present potential allocations as pie charts representing trends by stakeholder. Ideally, we would take the arithmetic mean among responses. Alternatively, we could develop a typology of responses, e.g., responses within 15% of each other would be treated as one group. One advantage of pie charts, especially if they are not associated with fixed percentages, is that they are less precise than specific figures and are therefore better suited to the data. Another analytical tool to identify trends would be cumulative distributions by category for each stakeholder. This would allow us to describe broad trends such as, "Among the 300 responses that proposed potential allocations, nearly half favored endowments of at least 20%; no endowment proposal exceeded 40%."

If the allocations do not add up to 100%, we would prorate them. For example, if the sum of the allocations is 90%, we would divide each allocation by 0.9.

Attachment PROPOSED DATABASE DESIGN

There are two different types of comment data. The multiple-choice responses and associated comments on the brochure are discrete comments. They would be entered in the Multiple-Choice Database. Free-ranging written comments on the questionnaire or in letters and verbal comments recorded at public meetings or received on our toll-free line will be entered on the Comments Database. For ease of data entry, both databases will be in RBASE, but the Multiple-Choice Database can easily be exported to Excel for analysis.

MULTIPLE-CHOICE DATABASE

This database would record all multiple-choice responses and associated comment fields from the brochure. However, it would not record comments noted in the open-ended comment field.

<u>No.</u>	<u>Field Name</u>	<u>Description</u>
1	INDEX#	Index number of the brochure. Each brochure must be numbered with a unique number so we can make sure it was entered correctly.
2	Person	Person's name on the brochure if available.
3	Organ	Organization person represents (if they have one).
4	Group	Stakeholder code, e.g., national environmental group.
5	Location	Location code -- where did the person live? This will be taken from return address, public meeting location, or failing either of those, from the postmark. See preliminary list of location codes. If location cannot be determined, enter "Unknown."
6	Region	Computer-generated code designating the region of the location code, e.g., PWS, Kenai, Kodiak/AP, outside the spill area, etc.
7	BroType	Source of response, i.e., received at public meetings, mailed in, telephoned, or other.
8	EntDate	Date form is entered (computer will fill this in by itself).
9-72	Various Names	Each box gets a field (Yes/No) and each comment gets a 30-letter note field, a "quotable quote" field, and a fact/value field. For the Potential Allocation Box, each alternative gets a Yes/No field to note if people circled it, and then each entry under "Your Alternative" gets a numeric field, e.g., one for Habitat Protection.

COMMENTS DATABASE

This database would record verbal comments presented at public meetings or phoned in on our toll-free lines, as well as written comments submitted in the form of letters or entries in the open-ended comment field in the brochure. Each comment would be entered individually and assigned an issue code. In that way, we can group all comments on one issue.

Comments presented verbally at public meetings were recorded electronically on a computer by a notetaker at the meeting. Consequently, they can be entered electronically into the database without being retyped.

All other comments will be entered into the database by the staff. If a comment deals with more than one topic, create a separate record for each topic addressed. There should be only one issue code assigned to each record.

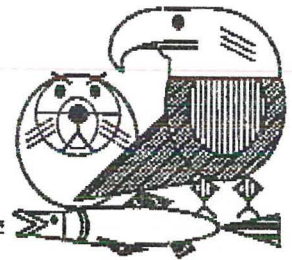
<u>No.</u>	<u>Field Name</u>	<u>Description</u>
1-8	Various	Same as for the Multiple-Choice Database. That is, these seven fields are identical between the two databases.
9	Comment	The comment is written in. This field is quite large and can handle a number of typed pages for each comment, if necessary.
10	Issue	Assign a single issue code to each comment. If a comment addresses more than one topic, create a separate record.
11	Quote	Indicate whether this comment is quotable.
12	FactValue	Indicate whether this comment primarily addresses a fact or a value.

Exxon Valdez Oil Spill Trustee Council

Restoration Office

645 G Street, Suite 402, Anchorage, Alaska 99501

Phone: (907) 278-8012 Fax: (907) 276-7178



B
EIS

FAX COVER SHEET

To: Rod Kuhn

Number: 271-2336

From: Karen Klinge

Date: 20 Jan '94

Comments:

Total Pages: 9

Here are the "Issues" developed for the draft plan. The last two pages were an earlier version and contain some different issues.

I wouldn't have any record of other Issues considered by Walcott.

Karen

Trustee Agencies

State of Alaska: Departments of Fish & Game, Law, and Environmental Conservation

United States: National Oceanic and Atmospheric Administration, Departments of Agriculture and Interior

13
EIS

RESTORATION PLANNING WORK GROUP
EXXON VALDEZ OIL SPILL OFFICE
645 "G" STREET
ANCHORAGE, ALASKA 99501

TO: RPWG MEMBERS

JANUARY 11, 1993

FROM: RAY THOMPSON *Ray*

SUBJECT: ISSUE/ALTERNATIVE ANALYSIS

It has been a while since we have made a status check on the relationship between alternatives and issues. We completed the issue statements in September 1992 after review and comment by the Restoration Team. Issues were also part of the package presented to the Trustee Council September 14. The Trustee Council did not specifically act upon the issue package at that meeting. The issues have not been a subject of the Trustee Council meetings since.

I feel, however, that we need to maintain an awareness of the issues as we develop draft alternatives for the restoration plan. I have made a broad evaluation of the relationship between issues and alternatives, and have enclosed that work for your scrutiny. This, or something similar to this, is appropriate for the process files as we move toward the draft restoration plan.

As I view the issues now, they range from the more specific concerns (2,3,6,7), to those less specific (1,4,8,11), to those which may not be issues (5,9,10). I need your evaluation of what, if anything, we need to do at this time to reinforce the value of the issues as guidance for alternative development. A response to this memo is requested by 1/13/93.

enclosures

15
EIS

ISSUE STATEMENTS FOR THE DRAFT RESTORATION PLAN

1. Injured resources and services vary in level of injury, rate of recovery, location, and value to ecosystem and humans. What priority or weight should be given to these factors in determining priorities for restoration options?
2. What level of information, either from new or continuing damage assessment studies, including socio-economic studies, is necessary to evaluate the need for and effectiveness of present and future restoration?
3. What level of monitoring or research is appropriate to determine the rate of recovery, health, and management of injured species, ecosystems, and services?
4. How will habitat protection mechanisms (such as special management designations, land acquisition and others) for public and private land and water be integrated into an overall restoration program?
5. What information should be distributed to the public and how should it be disseminated?
6. If there is a need for scientific, recreational or other facilities, where, how, and when should they be constructed?
7. What are the effects of restoration activities on local economies and subsistence? ⁴ ₅
- ¹ 8. What are the appropriate restoration strategies for restoring or enhancing both injured and non-injured resources and services?
9. What are the opportunities and appropriateness for long-term funding of programs through endowments?
10. How will restoration funds be managed and allocated?
11. Should restoration activities be evaluated concurrently or hierarchically?

END

September 01, 1992

B
E15

ANALYSIS OF ISSUES RELATIVE TO ALTERNATIVE DEVELOPMENT

AUTHOR: Ray Thompson

DATE: 12/16/92

ISSUE 1: Injured resources and services vary in level of injury, rate of recovery, location, value to the ecosystem and humans. What priority or weight should be given to these factors in determining priorities for restoration options?

ALTERNATIVE DISCUSSION: The range of alternatives represents several approaches to integrating injury with restoration options. Injury to selected resources and services was given specific treatment by RPWG during its evaluation of restoration options. These treatments were peer reviewed, validated or modified. Peer review also assisted RPWG in the development of an injury data table, which can be queried during the alternative development and analysis processes. Current alternative themes were constructed using two basic definitions of injury. These definitions are: 1) All injured resources and services; including sublethal effects and injuries not well documented; and 2) Limited to resources injured at a population level and injured services. Injury is not applicable to a natural recovery alternative. The priority for including a restoration option in an alternative will depend upon the alternative theme; including options which satisfy the theme.

In the eventual selection of a preferred alternative the Trustee Council will choose to place priority or weight on a particular combination of restoration activities or options. When these are appropriately represented in an alternative, that alternative would be the Trustees' preference. The reasons for the preference will be displayed in appropriate decision and analysis documents.

ISSUE 2: What level of information, either from new or continuing damage assessment studies, including socio-economic studies, is necessary to evaluate the need for and effectiveness of present and future restoration?

ALTERNATIVE DISCUSSION: In order to be viable, each alternative theme would yield an implementable alternative. An implementable alternative is comprised of options based upon damage assessment results. All restoration actions implemented by the Trustee Council will be monitored. Monitoring will provide information needed to assess the restoration value and effectiveness of individual options and the alternative. This assessment may indicate the need for more or less injury information and whether cost effectiveness of actions warrants their continued implementation. This process will be continuous throughout the life of the restoration plan.

ISSUE 3: What level of monitoring or research is appropriate to determine the rate of recovery, health, and management of injured species, ecosystems, and services?

B
E 15

ISSUE/ ALTERNATIVE ANALYSIS

2

ALTERNATIVE DISCUSSION: Monitoring is included in all alternatives. The design of a monitoring plan has been contracted. The monitoring effort will provide pertinent information on the need to continue with the restoration alternative or modify it through appropriate procedures.

ISSUE 4: How will habitat protection mechanisms (such as special management designations, land acquisition and others) for public and private land and water be integrated into an overall restoration plan?

ALTERNATIVE DISCUSSION: Habitat protection mechanisms are specifically defined within options 37 and 40. Where these options are included in alternative themes it can be concluded that the resultant alternative, if implemented, would permit state and federal managers to implement the mechanisms which would effect desired restoration goals.

ISSUE 5: What information should be distributed to the public and how should it be disseminated?

ALTERNATIVE DISCUSSION: The interested public should have information which enhances their knowledge of restoration actions, their effects, costs, and effectiveness. Information will not be excluded from public review unless there are current regulations limiting its distribution, i.e. archaeological site locations. Otherwise information will be distributed based upon demand and availability.

ISSUE 6: If there is a need for scientific, recreational or other facilities, where, how and when should they be constructed?

ALTERNATIVE DISCUSSION: Public comment is instrumental in the evaluation of need for facility construction, as well as the function and location of the facility. When facility development options are included within an alternative theme, which evolves into the selected restoration alternative, general where, how and when information will be considered at the program level, i.e. restoration plan. Specific site information is developed with the implementation plans for a facility. Facilities can include the likes of trails, buildings, campgrounds, hatcheries, fish ladders, etc.

ISSUE 7: What are the effects of restoration activities on local economies and subsistence?

ALTERNATIVE DISCUSSION: An analysis of effects of each

alternative will define the effects on these issues. Implementing any alternative will produce a unique combination of effects. The comparison of effects between alternatives will give the Trustee Council the information it needs to understand the implications of selecting an alternative for the preferred restoration action. Information on effects is shared with the concerned public prior to any decisions. In this way they will know what the projected effects on economies and subsistence are. Whether they agree or disagree with the analysis of effects is unknown, but it is certain that their influence will affect restoration decisions.

ISSUE 8: What are the appropriate restoration strategies for restoring or enhancing both injured and non-injured resources and services?

ALTERNATIVE DISCUSSION: The 40 (plus or minus) restoration options considered appropriate for restoration, enhancement, replacement or acquisition can be combined in several alternative restoration themes. Each of these combinations represents an implementable restoration strategy. The combination of options which effect injured and non-injured resources and services will be a decision made by the Trustee Council. Appropriate restoration strategies will be defined as alternatives; the implementation of any one or combination alternative will produce effects which may be considered appropriate or not by the Trustee Council. The Trustee Council will make its decision on restoration strategy after evaluation of the effects of the range of alternatives.

ISSUE 9: What are the opportunities and appropriateness for the long-term funding of programs through endowments?

ALTERNATIVE DISCUSSION: Endowment and other techniques for the funding restoration activities will be discussed as part of the evaluation of the alternatives. The relative value or appropriateness of any funding method will be presented when it is appropriate to the included restoration options. When a preferred alternative is developed it will include an analysis of endowment funding for some or all of the included restoration activities. The use of endowment funding for implementation of a selected alternative will be a decision of the Trustee Council.

ISSUE 10: How will restoration funds be managed and allocated?

ALTERNATIVE DISCUSSION: With the settlement documents as the base, and a preferred restoration strategy as a guide, financing the level, timing, and purpose of restoration actions will draw upon Trustee approved funding. The management and allocation processes will be bound by legal decisions and by State and Federal financial management procedures. However, the funding of alternative

B
EIS

ISSUE/ ALTERNATIVE ANALYSIS

4

restoration strategies may present challenges unique to the combination of options within the alternative.

ISSUE 11: Should restoration activities be evaluated concurrently or hierarchically?

ALTERNATIVE DISCUSSION: The acquisition process has evaluated these processes. The value of either method as it relates to included restoration options, will be presented in the alternative effects discussion in the restoration plan and accompanying Environmental Impact Statement. A decision on the relative value within each alternative will be made by the Trustee Council.

DRAFT

DRAFT

DRAFT

ISSUE STATEMENTS

1. TIMELINESS OF RESTORATION, INCLUDING CRITICAL LAND ACQUISITION, IS IMPORTANT AND MAY HAVE AN EFFECT ON HOW A RESOURCE OR SERVICE WILL RECOVER.
2. CONSIDER THE PROS AND CONS OF ADDITIONAL CLEAN-UP ACTIVITIES.
3. CONSIDER CONTINUATION OR INITIATION OF ADDITIONAL INJURY ASSESSMENT STUDIES TO PROVIDE INFORMATION AT ALL STAGES OF THE RESTORATION PROCESS FOR ALL INJURED RESOURCES AND SERVICES TO (1) EVALUATE NEED FOR PRESENT AND FUTURE RESTORATION AND (2) EVALUATE EFFECTIVENESS OF RESTORATION.
4. LONG TERM, COMPREHENSIVE, SCIENTIFIC MONITORING AND BASIC RESEARCH, INCLUDING COLLECTION OF BASELINE DATA, MAY BE CRITICAL IN ASSESSING LATENT AND SUBLETHAL OIL SPILL INJURIES, RATE OF RECOVERY, AND LONG-TERM HEALTH AND MANAGEMENT OF AFFECTED ECOSYSTEMS.
5. DESIGNATION OF WILDERNESS AREAS, MARINE SANCTUARIES OR OTHER SPECIAL MANAGEMENT AREAS AND PRESERVATION OF WILDERNESS QUALITIES AND CRITICAL HABITAT VALUES MAY FACILITATE RESTORATION OF INJURED RESOURCES AND SERVICES.
6. CONSIDER THE VALUE OF INFORMATION DISSEMINATION, EDUCATION, INTERPRETATION AND MEANINGFUL PUBLIC PARTICIPATION IN RESTORATION PLANNING AND PUBLIC UNDERSTANDING OF RESTORATION.
7. CONSIDER THE NEED FOR CONSTRUCTION OF SCIENTIFIC, RECREATIONAL AND OTHER FACILITIES.
8. CONSIDER THE EFFECTS OF RESTORATION ACTIVITIES ON LOCAL ECONOMIES AND SUBSISTENCE.

B
E15

9. CONSIDER (1) THE ABILITY OF VARIOUS RESTORATION STRATEGIES (INCLUDING MANAGEMENT MECHANISMS, NATURAL RECOVERY AND OTHERS) TO RESTORE INJURED RESOURCES AND SERVICES, AND (2) THE POSITIVE AND NEGATIVE EFFECTS ON BOTH INJURED AND NONINJURED RESOURCES AND SERVICES.
10. CONSIDER VARIOUS FUNDING TECHNIQUES FOR RESTORATION ACTIVITIES INCLUDING (1) ESTABLISHING ENDOWMENT FUNDS TO FACILITATE LONG-TERM PLANNING, (2) SEEKING MATCHING FUNDS TO DEVELOP RESTORATION PARTNERSHIPS AND (3) USING OPEN COMPETITION TO ALLOW ALL INTERESTED PARTIES THE OPPORTUNITY TO RECEIVE FUNDING.
11. CONSIDER USING SETTLEMENT MONIES TO PROTECT HABITAT AND TO ACQUIRE LAND OR INTERESTS IN LAND THAT WILL RESTORE OR REPLACE INJURED RESOURCES AND SERVICES, INCLUDING LANDS IN PARKS, REFUGES AND FORESTS, INTERTIDAL AREAS, WILDERNESS AREAS, AND MARINE BIRD COLONIES THROUGH THE SPILL AREA.
12. CONSIDER PROTECTING INJURED RESOURCES, THEIR HABITATS AND SERVICES FROM ACTIVITIES THAT ADVERSELY AFFECT THEIR ABILITY TO RECOVER.
13. CONSIDER USING SETTLEMENT MONIES TO ACQUIRE LAND OR IMPLEMENT OTHER RESTORATION ACTIONS INSIDE OR OUTSIDE THE SPILL AREA.
14. ALL INJURED RESOURCES AND SERVICES SHOULD RECEIVE EQUAL CONSIDERATION IN RESTORATION AND MONITORING ACTIVITIES.
15. EQUAL AND CONCURRENT CONSIDERATION SHOULD BE GIVEN TO ALL RESTORATION MECHANISMS.