From: Womac, Cherri G (EVOSTC)
To: Ian Dutton
Cc: Jennings, Laurel
Subject: RE: ASLC Submission on Final Draft SEIS
Date: Friday, July 16, 2010 1:14:28 PM

Thank you.

From: Ian Dutton [mailto:ian_dutton@alaskasealife.org]
Sent: Friday, July 16, 2010 12:13 PM
To: Womac, Cherri G (EVOSTC)
Subject: ASLC Submission on Final Draft SEIS

Dear Cherri,

Further to our previous submission, we offer the following brief comments on the Draft Supplemental Environmental Impact Statement (DSEIS) outlining environmental impacts of the Council's proposal to narrow the scope of their work to five clearly-defined restoration categories.

We appreciate the good work that has been done by the Council to date and the importance of the work that will be done under these priority areas. We also appreciate the intent to make program administration more efficient by shifting current Council responsibilities to "the entity responsible for the funded focus area" (p. 12).

However, we remain concerned that there is still a lack of clarity about how that disbursement process will occur and a lack of explicit recognition of the role played by local research and education organizations in the spill area (PWSSC, ASLC, UAF-SFOS, etc.), particularly in terms of promoting local and visitor understanding of the status of impacts and recovery. As the current Deepwater Horizon spill has so vividly demonstrated, there is a high level of ongoing public interest in the impacts of the Exxon Valdez spill and much that should be shared over the longer-term with the public via improved outreach. We reiterate the concern we made in our original submission that public education and outreach phase of research and restoration work funded to date has been inadequate. We believe that the proposed lessons learned/outreach described in the final draft SEIS (2.4.4c, p. 16) remains inadequate in both description and scope and that a more directed effort is needed as future restoration efforts proceed (see ASLC submission, March 30th, p.6-7).

We are also disappointed that the detailed comments that we and several other public submissions provided on the alternatives addressed within the Draft SEIS were not discussed in meaningful detail in this final draft. Specifically, we believe that there is inadequate consideration given in this draft to alternatives 2.5.2 (transfers to other agencies, including use of an NPRB fiscal agent model), 2.5.3 (reallocation of habitat funds) and 2.5.4 (use of funds for an endowment). From both a NEPA process perspective and from a public accountability perspective, we question whether it reasonable to dismiss the idea of an endowment in just one sentence (2.5.4, p.18) …"*using the remaining funds for a permanent endowment was rejected without detailed consideration due to legal issues which could hinder a permanent endowment?".* We believe that at the very least, those issues and barriers should be described.

From an environmental justice perspective (as you describe in section 1. (p.10), the lack of description of how those alternatives were treated also limits the opportunity to adequately consider the wider social impacts of various strategies and to adequately describe the potential impacts of the five proposed restoration programs. For example, in section 4.2.4.2.2 there is brief acknowledgement of how the proposed marine debris proposal might "offer long-term employment opportunities". However, there is no equivalent discussion of how alternative funding mechanisms such as the use of an endowment might benefit communities (e.g. by providing a longer term and predictable flow of funding to undertake these five key restoration activities) that were adversely affected, and continue to be affected, by the spill.

Please do not hesitate to contact me if you would like further information on our concerns and recommendations, or to discuss further how the Alaska SeaLife Center, as a leading positive legacy of the work of the Council, may contribute to the next steps in this process.

Thank you again for the opportunity to provide comment.

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To: pfree@northwestern.edu; alaskalaughingbear@mac.com; chris@alaska.net; richbrenner.alaska@gmail.com; mrostad@hotmail.com; rakenscrape@hotmail.com; weingart@ims.af.edu; dwinmar@gci.net; comatkin@gmail.com; Clarence Pautzke; dphillips@chugach-ak.com; bluefoxbay@hotmail.com; mdraskovich@kodiak.alaska.edu; len.schw@gmail.com; tcroyer@gmail.com; pj.anderson@usa.net; seth@ims.uaf.edu; glennelison@alaska.com; bill@mcbi.org; jkozub@aol.com; bud_rice@nps.gov; coho2@ak.net; dominick@nccsp.org; tom@nveyak.org; fitzhugh@u.washington.edu; tirs@erols.com; deb@kodiak.org; ericknudsen@gci.net; hopcroft@ime.uaf.edu; rmacintosh@gci.net; clworton@gmail.net; GMATE_PAC@hotmail.com; tws@wildlife.org; jillwitt@gmail.com; A96lynn@aol.com; KRAA@gci.net; Putney.nok@ak.net; Molly Mccammon; alutiiqpride1@crrcalaska.org; bcassidy@kodiakak.us; shuyakland@yahoo.com; Peter Armato; kris.holderied@noaa.gov; vage_chaos2003@yahoo.com; Erika.ammann@noaa.gov; chris@goak.com; tedraynor@ak.net; ebrann@fs.fed.us; iaedwardson@gmail.com; heather_coletti@nps.gov; tazdudeman@hotmail.com; randy@kniklake.com; info@oitenergy.com; timothyljoyce@yahoo.com; joy.landaluce@gmail.com; alaskafishman@hotmail.com; marinabriggs@hotmail.com; mbishop@pwssc.org; suefarzam@yahoo.com; rcampbell@pwssc.org; andersenpatc@ctcak.net; nbird@pwssc.org; rjkopchak@gmail.com; citymanager@cityofcordova.net; mhalverson@pwssc.org; cdfu@ak.net; dzastrow@fs.fed.us; abryson@nveyak.org; ks@copperriver.org; joe.l@gci.net; Chip Arnold; iandutton@alaskasealife.org; dkoliver@alaska.edu; Richard Hocking; joann@alaskasealife.org; Lori Polasek; Pam Tuomi; Tara Riemer Jones; Brett Long; akhaddow@gmail.com; kanderson@cityofseward.net; poates@cityofseward.net; pesa@gci.net; tuula_holliman@alaskasealife.org; fklasner@gmail.com; Howard Ferren; wilnbev@ak.net; Nancy Anderson; jeff_mow@nps.gov; lorna.arndt@att.net; kent_sundseth@fws.gov; rgifford@kodiak.us; pj.anderson@usa.net; tidepool@ak.net; Kodiakowen@gmail.com; deediepearson@hotmail.com;

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Subject: DSEIS available for public comment

The National Oceanic and Atmospheric Administration and the *Exxon Valdez* Oil Spill Trustee Council are seeking public comment on the Draft Supplemental Environmental impact Statement (DSEIS) outlining environmental impacts of the Council's proposal to narrow the scope of their work to five clearly-defined restoration categories. Comments on the DSEIS will be accepted on or before July 19, 2010. For copies of the DSEIS, to comment on, or for more information call (800) 478-7745 or on the web at www.evostc.state.ak.us