From: Rich Brenner
To: dfg.evos.nepacomments@alaska.gov
Subject: Comments for DSEIS
Date: Monday, July 19, 2010 11:52:02 AM

Hello,

The following are my comments pertaining to DSEIS for the Exxon Valdez Oil Spill Restoration Plan:

(1) It is unclear from reading this draft plan what organization would be responsible for the future administration of EVOS funds for any of the alternative plans. If it was mentioned within this document, it is certainly not clear. At the same time, this document completely rejects the transfer of funds to a "agency" without ever defining what it means by an agency: "Transferring the remaining funds to agencies to be expended as limited and required by the Exxon Valdez settlement, was rejected as unnecessary and inhibits the opportunity to allow nongovernmental organizations to propose creative collaborations and participation that could result in an efficient and creative use of resources."

Given that governmental and non-governmental can apply for grants from organization such as NPRB (an agency?) the reader cannot determine what is meant by the quote above. Does "agency" mean government agency? Does "agency" mean private-nonprofit agency? I strongly suggest that this entire section be re-written and made more clear. The term "agency" must be better defined within this document. Also, discussion needs to be given on why this idea was reject. It is entirely unclear how competition, high standards and a clear and consistent vision can be maintained (see section 2.2) without rigorous oversight by some "agency". All of these have been long-standing criticisms of the current EVOS administration of funds which as vacillated among areas of interest (herring, pink salmon, back to herring) and not maintained high standards of science.

(2) The section on the causes of herring decline in PWS needs to be re-written. First, no mention is made on the crash and lack of recovery of herring stocks in Cook Inlet. How are Cook Inlet stocks related to those in PWS? I certainly do not know, but given the proximity and lack of recovery, this needs to be mentioned. Second, there was no mention of hypotheses concerning hatchery salmon production in PWS as a potential cause of the herring crash or lack of recovery. The authors of this DSEIS should note that this hypothesis that was put forth in 1999 by Pearson et al within the Canadian Journal of Aquatic Science (56: 711-737). At the very least, the authors of this DSEIS definitely need to mention the analysis published by Deriso et al. in 2008 within Ecological Applications (18(5): 1270-1286).

I realize that it is not the intention of this DSEIS to assess the validity of all hypotheses concerning the crash or lack of recovery of herring in PWS. However, linking the decline of herring (1992-1993) with a major increase in hatchery pink salmon production in PWS (1988) is just as probable as linking the herring crash with oil, which was mentioned in this DSEIS. This section needs to re-written to include mention of hatchery salmon production in PWS and large-scale oceanic changes in the North Pacific as possible causes for the decline or lack of recovery of herring in PWS.

Thank you,
Rich Brenner