



March 30, 2010

Laurel Jennings
Exxon Valdez Oil Spill Trustee Council
441 West 5th Avenue, Suite 500
Anchorage, AK 99501

Sent via email: dfg.evos.nepacomments@alaska.gov

RE: Scoping comments for draft Supplemental Environmental Impact Statement

Dear Ms. Jennings:

Thank you for the opportunity to submit comments as the EVOS Trustee Council re-assesses the existing Environmental Impact Statement (EIS) created in 1994. On behalf of the Board of Directors of the Prince William Sound Science Center, I am pleased to submit this letter. We understand the two goals of this process are to review and respond to new circumstances related to the restoration efforts and to find a more efficient administrative structure to manage the remaining funds. We generally support the five focus areas identified by the Trustees for future restoration activities.

We strongly encourage the bulk of the remaining funds to target two of these categories, herring and the long-term monitoring of marine conditions. In order for us to truly understand the complexities of these dynamic ecosystems, we believe it is critical to continue research and monitoring of the Prince William Sound herring population and marine conditions in the broader spill-impacted region. Improved knowledge in this area will be of significant and long lasting benefit to (1) protecting our resource base and (2) directly benefiting resource users in the spill impacted area, and probably beyond. Both of these focus areas deserve sufficient funds set aside to support annual allocations of \$2-3 million for each focus area, ideally for at least 30 years.

The lingering oil issue is more difficult to effectively address. It is disheartening that more than 20 years after the *Exxon Valdez* oil spill there remains more than 23,000 gallons of subsurface oil in a relatively unweathered state. While experts have developed some extremely expensive remediation plans that might accelerate the oil degradation, it appears that the best action with the limited available funds is periodic monitoring of the beaches to see how many decades it takes for natural degradation in our cold climate. If additional funds are secured through the Reopener, a larger scale restoration effort specifically targeting this problem can be undertaken.

The fourth focus area identified by the Trustees – of harbor protection and marine restoration – is worthy of support at a lesser level than suggested. These projects can be accomplished in shorter periods of time and close out within 10 years. Some of this work, particularly the harbor clean-ups and marine debris removal, will be needed indefinitely; other agencies and organizations must pick up those ongoing costs as part of their normal responsibilities.

We have a number of suggestions regarding the Trustee Council's goal to find a more efficient administrative structure to manage funds remaining in the Restoration Reserve. The administrator for these projects is most appropriately located in the region where the projects are occurring.

Three science-based organizations were established as a direct result of the 1989 oil spill and are located in the spill-affected communities of Cordova and Seward. Both the Prince William Sound Science Center and the Alaska SeaLife Center are managed as non-profits with boards of directors and science advisory committees; the third, the Prince William Sound Oil Spill Recovery Institute, was established by Congress in 1990 to be administered through the PWS Science Center. These organizations have proven track records of responsible management and expenditure of public funds. They participate in competitive funding rounds, have built in science advisors and policies on peer review, etc., and have policies and procedures on outreach and publication.

OSRI actually predates the EVOS settlement and formation of the EVOS Trustee Council; OSRI's mission overlaps that of the Trustee Council and OSRI's Advisory Board is mandated by Congress to include three state and three federal agency representatives as well as stakeholders appointed by Alaska's Governor from the Alaska Native community, the oil and gas industry and the fishing industry. In 1994, it was OSRI funds which helped jumpstart one of the first EVOS research programs, the *Sound Ecosystem Assessment*. OSRI also initiated the PWS Nowcast-Forecast System which then became the foundation for the Alaska Ocean Observing System's pilot project in Prince William Sound.

While we understand it may require legislative approval – as was done in 1999 to allow the Trustee Council to invest its funds outside of the U.S. Treasury, we suggest establishment of endowments to support the research categories of herring and long-term monitoring of marine conditions. These endowments should be based at and managed through existing institutions located in the oil spill impacted region with a demonstrated history of conducting research in this region. An annual report and audit would be required for submittal to the Trustees to ensure that the programs funded through the endowments meet the terms of the Council's restoration program. We encourage full exploration of this alternative in the SEIS.

Done well, these programs will result in a long-term legacy of the Trustee Council! We look forward to continuing work in partnership with the Trustees on the restoration programs.

Sincerely,



Eric Knudsen, Ph.D.
Chair, Board of Directors
Prince William Sound Science Center