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Laurel Jennings
Exxon Valdez Oil Spill Trustee Council
441 West 5th Avenue, Suite 500
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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. I am writing based on the experience I have gained from nearly seven years as Executive Director of the Alaska Ocean Observing System (AOOS) and a decade as Executive Director of the Exxon Valdez Oil Spill Trustee Council. These comments are not necessarily those of the AOOS Board of Directors.

I would like to focus my comments on one of the five focus areas identified by the Trustees for future restoration activities: long-term monitoring of marine conditions. The Council's proposal to fund this effort with approximately \$25 million over a 20-year period would not adequately cover the monitoring needs of the spill-impacted region and I strongly urge you to consider a larger allocation to this category.

As noted in the Federal Register notice: Data on environmental factors that drive ecosystem-level changes is "increasingly valuable in illuminating the larger ecosystem shifts that impact and influence a broad variety of species and resources injured by the spill." These environmental factors include physical conditions of the ocean, ranging from changes to temperature, salinity, currents, freshwater input, wind and waves, to chemical conditions which include contaminants and ocean acidification, to biological conditions which range from nutrients and phytoplankton to whales, birds, and fish.

A comprehensive monitoring program would track changes over time, and provide a baseline for determining human use impacts, natural variability and impacts from climate change. If the Council had implemented the Gulf Ecosystem Monitoring Program (GEM) as originally envisioned, we would now have a decade of information from a suite of nested monitoring stations in key watersheds, intertidal and subtidal areas, the nearshore and offshore waters. We cannot count on existing federal and state agency budgets to meet these needs. What I have discovered in working with AOOS is that almost every resource agency manager and marine user unequivocally supports increased monitoring of our marine system, but sustained funding for these activities is difficult to obtain.

Our experience with operating a pilot observing system in Prince William Sound indicates that such a program could cost \$3-5 million a year for the entire spill region, especially in the early years when model forecasts are being developed and leveraging is just beginning. A program like this, however, not only collects information that can inform ecosystem-based management, but also information that can be used to better predict any future contaminant spill trajectories and provide better ocean condition information in real-time to make navigation (by commercial shippers, fishermen and recreational boaters) safer and Coast Guard search and rescue techniques more effective. The information can also help federal and state agencies do a better job of managing human uses of the oceans and coasts whether the issue is coastal development, shipping, offshore oil and gas, tourism or commercial fishing. These are all activities currently occurring in the spill region, and a monitoring program designed to meet multiple user needs becomes a win-win for everyone.

The motto of the Alaska Ocean Observing System, authorized in law as part of the national Integrated Ocean Observing System, is to observe once, use multiple times. The Trustee Council's legacy could be increased knowledge about marine conditions that would not only help inform management of injured species and resources, but also improve ecosystem based management, navigation safety, responses to coastal hazards, and tracking of climate variability and trends, including ocean acidification.

I would also urge you to consider using AOOS in some way as a framework for future EVOS-funded monitoring. Our board is made up of federal and state agencies with ocean and coastal authorities, all the ocean research institutions in the state, including the University of Alaska. We are the only entity in the state whose mission is to address regional and national needs for ocean information, gather specific data on key coastal and ocean variables, and ensure timely and sustained dissemination and availability of these data. The board has made a major commitment to establishing an ocean and coastal regional data hub for Alaska at www.aos.org, which could become a long-term archive and access point for all past and future EVOS data.

In addition, I would recommend considering use of the Alaska Sea Grant Marine Advisory Program agents to help serve as community liaisons in the major communities in the spill region: Cordova, Seward, Homer and Kodiak and provide that continuous interface between the community needs and the observing/science community.

I appreciate the opportunity to provide these comments as you proceed with the scoping process.

Sincerely,

Molly McCammon
Executive Director