



July 19, 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](mailto:dfg.evos.nepacomments@alaska.gov)

RE: Comments on draft Supplemental Environmental Impact Statement

Dear Ms. Jennings:

We appreciate the opportunity to comment on the Draft Supplemental Environmental Impact Statement (SEIS). Our earlier comments submitted for the Scoping Process of this SEIS stand as written. While we generally support Alternative Two of the Draft SEIS, we have a number of suggestions. In particular, we want to re-emphasize the following paragraph from our earlier letter:

“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.”

We remain supportive of the five targeted categories identified by the SEIS for restoration activities, and concur that decisions on restoration activities should be made in a context that reflects the need to address non-recovered and recovering species and services. Herring is one of only two species recognized as non-recovering. Herring are critically important to the ecosystem of Prince William Sound and have been a significant commercial fishery as well. As an important non-recovering species we feel that additional funding should be put towards the herring program. Any hopes for developing a restoration program or improving our understanding of the fish in order to improve future management requires a mixture of activities from monitoring to research to demonstration projects. While there are, and should be, connections to the monitoring portion of the SEIS, the need for short-term process studies and demonstration projects makes the herring component distinct from a monitoring program. Funding such research also requires greater funding than would be available under the current draft SEIS.

The Trustees identified a desire to fund longer-term integrated programs. We share their opinion that EVOS funds “be expended with an emphasis on producing information to support the future management and natural restoration of the injured species” and that “the information produced ....can enable management consistent with long term restoration.”

In further considering this issue, we note the importance of archiving data and then utilizing it through the continually improving computer programs available to deliver what we have learned to resource managers, scientists and the general public. One way to help achieve cross-discipline dialogue and collaboration is through real-time sharing of information and data. Our capacity for collection of real-time data improves each year and

data management programs must incorporate methods to effectively and quickly share this data through the Internet.

The responsibility of a proposed new category of **Archive and Informatics** would include both historic information in electronic format, and data for programs funded by the EVOS Trustee Council. This should not only be a library and catalogue function as has been done through ARLIS, representative of the more traditional approach. The Archive and Informatics sector would take advantage of continually improving technology to develop capacity for the “host” to continue supporting (and integrating) diverse information gained through the programs over time. The Request for Proposals (RFP) for this category should include requirements for capacity for archiving and visualization of information in four dimensions, and also comparison of information across various program sectors and disciplines. The RFP should ask how the Archive and Informatics will intersect with and integrate across the funded sectors and remain robust over time.

We note a number of changes made since the scoping process began in the draft SEIS – particularly the change from targeted dollar amounts for the five categories to percentages, including low to high ranges for a few categories. We provide our preference of targeted percentages for the various categories in a table below, and also suggest amounts to assure data management and delivery, as well as for administrative expenses.

The SEIS lacks detail on how the Trustees intend to achieve a reduction in administrative expenses, as is one of their stated goals. We certainly support more dollars going to the programs and again encourage establishment of endowments or dedicated funds set aside to support the research categories of herring and long-term monitoring of marine/ocean conditions. Alternatively, establishment of fixed priced contracts to award these dedicated programs funds may allow greater opportunity and flexibility for those entities implementing the programs.

These contracts 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 submitted annually to the Trustees to ensure that the programs funded through these contracts meet the terms of the Council’s restoration program.

We encourage the Trustee Council to issue a RFP for administration services. Organizations like the Prince William Sound Oil Spill Recovery Institute (OSRI) have a similar mission to the EVOS Trustee Council and can provide a means to reduce the overall costs for management of EVOS projects. Perhaps, there are other processes being considered that may be beneficial to programs while reducing administrative expenses, but none are described in the draft SEIS.

The remaining restoration funds available are very limited. For that reason, we think major investments in lingering oil should be dealt with through the reopener process. This unanticipated damage needs to be addressed outside the investment of current funds.

We applaud your efforts to focus use of the remaining restoration fund and reiterate our support for additional restoration activities and research to address Herring, still listed as not recovering, and other species and services still in the process of recovery.

Sincerely,



Eric Knudsen, Ph.D.  
Chair, PWSSC Board of Directors

Attachment: *Table proposing spending allocations*

**Total proposed to allocate**  
*(estimated during the Scoping Process at \$81 million)*  
**for Research, Monitoring & General Restoration (RM&GR)**

<b>Categories proposed in Draft SEIS</b>	<b>Percentage of Total for RM&amp;GR (PWSSC preferred)</b>	<b>As proposed in draft SEIS</b>
<b>Herring</b>	35.0%	11-21%
<b>Long-term monitoring of ocean conditions</b>	30.0%	15-25%
a) Recovery of injured resources		
b) Monitoring factors that may inhibit recovery		
<b>Harbor protection, marine restoration &amp; lessons learned</b>		
a) Waste disposal and harbor projects	7.5%	3-13%
b) marine debris removal	7.5%	\$6 mil.
c) Lessons learned/Outreach	5.0%	\$4 mil.
<b>Lingering oil</b>	0.0%	?
<i>New categories proposed for addition</i>		
<b>Data Archive and Informatics</b>	5.0%	
<b>Administration for all programs</b>	10.0%	
<b>TOTALS</b>	100.0%	?