



EYAK PRESERVATION COUNCIL

PRESERVING WILD
SALMON HABITAT &
INDIGENOUS CULTURE

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March 16, 2020

Dear Alaska Department of Environmental Conservation,

The Eyak Preservation Council (EPC) is a public charity with 501(c)(3) status based in Cordova, Alaska. We offer educational and outreach programs that concentrate on: protection of our regional wild salmon ways of life, Indigenous cultural preservation and the promotion of sustainable economies. We represent the communities and people of the Copper River, Prince William Sound and northern-central Gulf of Alaska. We have program participants and constituents from this region and from the nation at large.

Our organization was conceived of on the day of the Exxon Valdez Oil Spill, by Eyak commercial and subsistence fisherman turned into an organizer and visionary leader, Dune Lankard. Our founder and Board President, Lankard, along with associates, such as Professor Richard Steiner, Dr. Rikki Ott, and members of our Advisory Council, such as David Lynn Grimes, were instrumental in advocating for the Prince William Sound Regional Citizen Advisory Council (PWSRCAC) and the passage of federal and state statutes and regulations that now ensure oil spill prevention and response.

The Gulf of Alaska and Prince William Sound are biologically vibrant ecosystems. EPC contends there is no way to successfully and completely clean up oil spills on or in water. “Based on the science, expecting to adequately remedy large spills with current technologies seems like wishful thinking”; scientific reports expose the fact that there is no truly effective technology to clean up oil spills (Nikiforuk, *Smithsonian*, 2016). Oil spills in the oceans are the most complex of all. Even today, the number one response to oil spills in the ocean is the use of chemical dispersants, which sink into the water column, further harm the environment, and increase the number of marine organisms exposed to spilled oil. Clearly, dispersants are not a solution. Alaska must not risk the last regenerative and commercially valuable wild salmon runs on Earth for a nonrenewable, toxic, and economically unstable resource.

EPC’s leaders’ efforts helped create citizen oversight in the form of Regional Citizen Advisory Councils—ensuring safer oil tanker operations. Back in 1991, as active participants with Governor Wally Hickel, Attorney General Charlie Cole, and the EVOS Trustee Council, EPC’s leaders ensured that half of the \$900 million oil spill restoration fund was used to provide conservation protections for the coastal temperate rainforests of the oil spill region. EPC Founder, Dune Lankard, stated, “We realized back then that the key to restoration of any kind (whether it be endangered habitat, wild salmon runs, Native culture, etc.) was that we first preserve what we have, and then try to restore what’s been destroyed.”



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EPC is a proponent of strategically moving Alaska’s economy away from dependence on oil and gas. The oil and gas industry caused an unacceptable amount of damage to our coastal communities. The Exxon Valdez disaster, on March 24th, 1989 is regionally known as “the day the water died”. An estimated 250,000 seabirds, 2,800 sea otters, 300 harbor seals, 250 bald eagles, up to 22 killer whales (of the AT-1 Pod), and billions of salmon and herring eggs died because of the Exxon Valdez Oil Spill, as referenced by the Exxon Valdez Oil Spill Trustee Council “Questions and Answers about the Spill”. Prince William Sound and Copper River Delta fishermen, businesses, families and entire communities still suffer due to the traumatic effects of the spill.

In March of 1989, the “Exxon Valdez spill in Prince William Sound, grew at the alarming rate of half a football field per second over two days,” according to Smithsonian reporter, Andrew Nikiforuk (2016). Dune Lankard has said, “sometimes it takes a catastrophe to wake us up.” Now that so many citizens have woken up, and expressed their desire for increased prevention and response readiness, it is the duty of Alaska Department of Environmental Conservation (ADEC) to uphold current industry standards and responsibilities in order to honor and respect those public efforts.

The Cordova and Valdez communities were hit hard by the Exxon Valdez Oil Spill. Both respective City Councils passed resolutions supporting the maintenance of substantial and comprehensive Alaskan laws and regulations regarding oil spill prevention and response. These Resolutions reflect the opinions of the overwhelming majority of citizens in all of Prince William Sound, the Copper River Delta, and the Gulf of Alaska communities. Even stronger regulations that protect our communities, economies, coastlines, and subsistence food sources from more potential oil pollution are required.

In 1989 and every year since then, the oil and gas industry directly threatened the sacred, ancient, Indigenous ways of living in communion and reciprocity with water, salmon and other fish. For example, in the villages of Tatitlek and Chenega, people have experienced chronic health issues due to the oil spill. Native people in both rural villages have also noted a direct decline of subsistence resources following the oil spill (Fall, 1999). The oil spill caused elders to be concerned about the health of some of their subsistence foods, and these concerns about contamination have persisted for decades following the event. Negative perceptions about the health of subsistence resources have become intergenerational, causing Indigenous communities to lose traditional knowledge about where and how to harvest.

These tragic realities in the villages of Chenega and Tatitlek represent an inexpressible and incalculable loss of Alaska Native culture, which is indeed a loss for all of humanity. Sadly, the profits from this polluting industry have not benefitted the Native communities of Prince William Sound, except for a few jobs at Ship Escort Response Vessel System (SERVS) in Valdez and residents who coordinate



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the core oil spill response fleet in Cordova. As a recent University of Alaska Institute of Social and Economic Research study (*Long-term benefits to Indigenous communities of extractive industry partnerships...*) recently published: “one may need to temper expectations about what extractive industry development can achieve for Indigenous communities.”

We know that North Slope crude is a highly volatile and heavy oil. Therefore, cleaning up North Slope crude costs nearly ten times more than light oil because it persists longer in water. What our constituents have learned repeatedly in the SERVS training is that most oil will cover hundreds of kilometers in a matter of a few days, making clean-up coordination an immense challenge even with the current standards in place.

Alaska requires stringent legislative regulations and protective measures based on current shipping and pipeline standards and the best available science. The increasing intensity of storms, as well as dramatic shifts in ocean chemistry and temperature, must be taken into account.

The industry claims that the regulations that the public worked hard to put in place for the protection of all Alaskans are “overly burdensome” and “outdated.” In the name of transparency, we strongly request to know who made these statements. These claims are not based in fact, but are based in a desire for increased profit. Profit-driven companies have historically proven that they are not considering the wellbeing of our human communities, wildlife, nor our environmental health.

Shifting the burden of risk from the oil industry to the local communities that depend on the fishing industry by weakening regulations would be a disgraceful act. The Alaska Department of Environmental Conservation, must remain loyal to its stated mission of: “*Conserving, improving, and protecting Alaska's natural resources and environment to enhance the health, safety, economic, and social well-being of Alaskans.*” As an agency, you have been granted a responsibility to safeguard natural resources for the well-being of all Alaskans. Here in coastal Alaska, our economies depend on healthy, regenerative fish stocks. Each year world-renowned, renewable Alaskan fish resources, become increasingly rare and valuable elsewhere in the world. To protect our Alaskan way of life, with the best science and the most stringent regulations, is wise, visionary and absolutely necessary.

It is dangerous and economically erroneous to weaken any oil spill prevention or response planning standards, especially as our Alaskan oceans are changing drastically. It is the inherent right of all Alaskans to demand and receive strong, sound, and effective oil spill prevention and response plans in place.

ADEC Commissioner, Jason Brune, has been quoted saying that we need to “put every precaution in place to ensure that something like that [the Exxon Valdez Oil Spill] would never happen again.” Following this directive, Mr. Brune ought to lead



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ADEC to strengthen C-Plan regulations, not weaken them. Stick to your word as an agency, and listen to the bottom line of thousands of constituents in the Exxon spill zone: **Any weakening of regulations regarding prevention and response is completely unacceptable and irresponsible.**

Thank you for the opportunity to comment on this critical issue.

With concern for our planet's remaining wild places,

Carol Hoover, Executive Director of the Eyak Preservation Council

Skye Steritz, Program Manager of the Eyak Preservation Council