

March 28, 1990

Mike Mansker
Project Coordinator
Department of Environmental Conservation
Post Office Box 0
Juneau, Alaska 99811-1800

Dear Mr. Mansker:

RE: City of Valdez Comments on Alyeska's Prince William Sound
Tanker Spill Prevention and Response Plan

This letter represents the formal comments of the City of Valdez with regard to the draft oil spill contingency plan presented by the Alyeska Pipeline Service Company. These concerns with the draft plan were expressed by City Councilmembers present at the March 6th public hearing on this plan, but I wish to emphasize the full support of the City of Valdez behind these sentiments.

First, the City of Valdez strongly opposes the provision in Section 404 of the plan that only designates Community Response Centers in Cordova, Homer, and Kodiak, with the Cordova office being responsible for boat callouts in Cordova, Valdez, Whittier, Chenega Bay, and Tatitlek (emphasis added). This designation makes absolutely no sense from an operational point of view, and it was apparent at the hearing that this obvious flaw was taken too lightly by Alyeska officials. Nearly every oil spill or potential oil spill incident has occurred in Port Valdez and represents a more localized problem that should be addressed by locally generated responses originating in Valdez. The Ship Escort Response Vessel System (SERVS) operates out of Valdez and the SERVS Manager is the Initial Response Incident Commander (Section 402.4 of plan). It only makes sense that Valdez function as a Community Response Center for Port Valdez, Valdez Arm, and Northern Prince William Sound so that community responses can be more readily coordinated with SERVS actions. A Valdez based Community Response Center should probably be responsible for calling out boats in Tatitlek and Whittier, as well as Valdez, as a matter of geography and improved coordination.

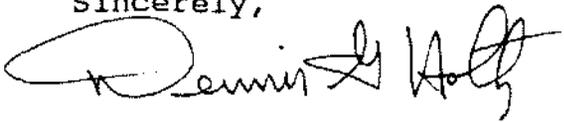
The second matter discussed at the hearing is the need for improved air service into Valdez as part of the contingency plan. The

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Valdez City Council recently passed a resolution requesting that this transportation matter be addressed. The recent announcement of service to Valdez from Mark Air with an MLS equipped Dash-7 is good news, but the governmental entities and the oil industry need to insure this level of service remains viable in order to address oil spill prevention and response needs.

Thank you for your attention to these concerns.

Sincerely,

A handwritten signature in black ink, appearing to read "Lynn Chrystal". The signature is stylized and cursive, with a large loop at the beginning.

for Lynn Chrystal
Mayor

LC:DG:blp

cc: Dan Lawn, Oil Spill Contingency Plan Coordinator
Bill Walker
Jason Wells