

VALDEZ FISHERIES DEVELOPMENT ASSOCIATION, INC.
SOLOMON GULCH HATCHERY



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December 14, 2023

Melissa Woodgate (melissa.woodgate@alaska.gov)
Department of Environmental Conservation
SPAR/PPRP
P.O. Box 1709
Valdez, AK 99686

**Re: VFDA's Comments on Alyeska Pipeline Service Company's
Application for Renewal of the Valdez Marine Terminal Oil
Discharge Prevention and Contingency Plan, ADEC Plan No. 23-
CP-4057**

Ms. Woodgate:

Thank you for providing Valdez Fisheries Development Association Inc. (VFDA), and the public an opportunity to review and comment on the draft reauthorization of the Alyeska Pipeline Service Company (APSC) Valdez Marine Terminal (VMT) Oil Discharge Prevention & Contingency Plan (ODPCP). We provide these comments specifically in response to the proposed revisions to ADEC Plan No. 23-CP-4057 and its considerations for protections to VFDA's Solomon Gulch salmon hatchery and overall spill response.

VFDA owns and operates the Solomon Gulch Hatchery (SGH) located along the coastline of Port Valdez, approximately 2 miles east of the VMT. VFDA's primary mission is to enhance the commercial and sport fisheries in Prince William Sound and benefit all other businesses that depend on this resource. The fisheries enhancement programs at the hatchery produce average annual returns of 11 million Pink salmon and up to 130,000 Coho salmon. With a production capacity of over 270 million salmon eggs, the SGH is the largest single species hatchery in North America. On average, salmon returns to the hatchery generate approximately \$112 million in economic output and create over 760 direct and indirect jobs within the Southcentral Alaska region.¹

¹ Economic Impact of the Valdez Fisheries Development Association Inc. (McDowell Group 2018).

Considering this information, the SGH is a significant economic engine for Alaska. It is considered to be of substantial public concern and a sensitive area for protection that requires immediate priority protection if there is an oil spill at the VMT.

VFDA submits comments on the following plan documents and proposed revisions to the ODPCP:

Volume 1: Regulatory Manual

Part 2: Prevention Plan

Section 2.1.7 Secondary Containment Requirements for Aboveground Tanks

VFDA supports the efforts of the Prince William Sound Regional Citizens Advisory Council (PWSRCAC) and others, to call for APSC to inspect and assess secondary containment systems for the VMT East Tank Farm, specifically the integrity of the buried catalytically blown asphalt (CBA) membrane. Given the age of this system and its known condition, ADEC should require APSC to conduct additional assessment and testing as necessary to ensure that the system meets the impermeable standard required by 18 AAC 75.990 (124) and protects as designed to prevent the migration of crude oil into the groundwater.²

Request: VFDA requests that Alaska Department of Environmental Conservation (ADEC) continue to require substantive testing and work with APSC and others to address this area of concern.

Volume 1: Regulatory Manual

Part 4: Best Available Technology

Section 4.4 Trajectory Analysis and Forecasts

² 18 AAC 75.990(124) provides:
‘sufficiently impermeable’ means, for a secondary containment system, that its design and construction has the impermeability necessary to protect groundwater from contamination and to contain a discharge or release until it can be detected and cleaned up; for design purposes for tanks constructed after May 1992, ‘sufficiently impermeable’ means using a layer of natural or manufactured material of sufficient thickness, density, and composition to produce a maximum permeability for the substance being contained of 1×10^{-6} cm per second at a maximum anticipated hydrostatic pressure, unless the department determines that an alternate design standard protects groundwater from contamination and contains a discharge or release until detection and cleanup . . .

VFDA submitted comments during the review of 2018 APSC VMT ODPCP Scenario 4 amendment and the subsequent adjudicatory appeal. We submitted our concerns with the trajectory modeling produced by OILMAP for response planning of spilled crude oil for Scenario 4. VFDA has also previously voiced concerns that the 1) anticipated direction of spread is only to the west of the VMT and, 2) rate of travel, may not be accurate. Given observed current and prevailing wind directions in Port Valdez and experiences with actual spills, such as the 1994 T/V Eastern Lion spill, it has been demonstrated that oil moves quickly towards the SGH and not always away from it as the OILMAP simulator predicts.

PWSRCAC made a significant investment to install current and wind monitoring stations within the VMT Security Zone and at the Valdez Duck Flats to provide actual on-site data. The data obtained at those sites might better guide actual response efforts and be a more accurate predictor of oil movements within Port Valdez.

Request: VFDA requests that ADEC work with APSC to develop oil trajectory modeling within Port Valdez using best available technology and local current and wind data.

Volume 3: Technical Manual

Section 9: Sensitive Area Protection Tactics

Section 9.6, VMT-SA-6, Deployment Plan for Solomon Gulch Hatchery

In these comments, VFDA specifically focuses on revisions by APSC to VMT CP-35-2 Volume 3, Section 9.0 “Sensitive Area Protection Tactics.” It appears that the majority of Alyeska’s revisions (generally and in this Section) replaced phrases with acronyms, which VFDA views as non-substantive.

In Section 9.6, APSC proposes to delete the following language under Figure 9.6-1 Deployment Plan for Solomon Gulch Hatchery, Photo & Illustration:

“Due to limited response time associated with an oil spill, all or portions of the boom will be permanently installed whenever fish fry are in the fish pens, from approximately March to June each year.”

Because Alyeska does not delete the word “Note”, if ADEC allows that revision, then there would not be any language under Figure 9.6-1, simply the word

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Note. Section 9.6.1 discusses tactics for booming and the language proposed for elimination under Figure 9.6-1, and booming concepts are stated in other words in the Section. However, the substance of the booming tactic is summarized in the Note and therefore must be retained.

There is no question that removing the booming procedure would reduce protection at the SGH during a critical time, which is from approximately March to June each year, when juvenile salmon are in the net pens offshore of the hatchery. There is not enough response time to deploy the booming of the hatchery net pens within hours 0-5, in the event of a spill. Therefore, pre-booming the net pens when salmon are in the net pens is extremely prudent and required to ensure the safety of these extremely vulnerable salmon fry. Language emphasizing APSC's commitment to pre-boom the SGH when juvenile salmon are present, must remain in the Plan.

Request: VFDA strongly requests that ADEC require APSC to retain the original language under Figure 9.6-1. It is an important concept that should be associated with the map of the SGH depicted in Figure 9.6-1 and its presence in the document is required.

Thank you for the opportunity to provide input for the process of evaluating proposed changes to the VMT ODPCP. We look forward to working with ADEC and APSC to address any questions you may have.

Sincerely,



Mike H. Wells,
Executive Director