STATE OF ALASKA

ANILCA IMPLEMENTATION PROGRAM Office of Project Management and Permitting

SEAN PARNELL, Governor

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October 26, 2010

Andy Loranger, Refuge Manager Kenai National Wildlife Refuge Ski Hill Road, P. O. Box 2139 MS 519 Soldotna, Alaska 99669-2139

Dear Mr. Loranger:

The State of Alaska reviewed the Environmental Assessment (EA) for the Shadura #1 Exploration Project, which evaluates a natural gas exploration project on Cook Inlet Region, Inc. (CIRI) subsurface estate inholdings within the Kenai National Wildlife Refuge. The following consolidated state agency comments were compiled by the State's Alaska National Interest Lands Conservation Act (ANILCA) Implementation Program and cover issues relative to ANILCA and other state interests. Any correspondence or response pursuant to the federal Coastal Zone Management Act and the Alaska Coastal Management Program will be provided separately by the Division of Coastal and Ocean Management.

The State supports the proposed action to evaluate the potential natural gas resources in CIRI subsurface estate inholdings within the Refuge. We also appreciate the EA recognizes access for the proposed project is allowed pursuant to ANILCA Section 1110(b). This project, and any subsequent production of gas resources, could bring much-needed energy supplies to Southcentral Alaska as well as provide other economic benefits to both local communities and the State.

There are no cataloged anadromous streams within the footprint of either access alternative. The fish bearing stream crossings proposed in either alternative include adequate protection measures to ensure the project will not have an adverse effect on fish passage.

There are, however, numerous anadromous streams in the vicinity of the project. Demobilizing the road after use is an important aspect of the proposed project to protect anadromous streams from potential illegal crossings by all-terrain vehicles. This is especially important if the preferred (West) alternative is implemented as the origin of this access route is within a highly used recreational area. Section 3.2.4 and Appendix A describe how planting new trees and placing deadwood will be conducted to camouflage the decommissioned road. We anticipate these measures, properly installed, will provide adequate protection for anadromous streams.

Thank you for this opportunity to comment. Please contact me at (907) 269-7529 if you have any questions.

Sincerely,

Susan E. Magee

ANILCA Project Coordinator

cc: Sally Gibert, ANILCA Program Coordinator