



February 9, 2017

Andy Loranger, Refuge Manager  
Kenai National Wildlife Refuge  
U.S. Fish and Wildlife Service  
1 Skihill Road  
Soldotna, AK 99669

Dear Mr. Loranger:

The State of Alaska reviewed the U.S. Fish and Wildlife Service's (USFWS) Draft Compatibility Determination (CD) for natural gas storage activities in the Swanson River Field (SRF) within Kenai National Wildlife Refuge. The preferred alternative selected in the 2005 Environmental Assessment (EA) authorized the gas storage project, and this CD is part of a 10-year review for the determinations made in the EA. As the public notice indicates, while the designated operator of the SRF has changed from Unocal to Hilcorp Alaska, LLC, the natural gas storage project's purposes, operational aspects, and conditions evaluated in the EA have not changed. The following comments represent the consolidated views of state resource agencies.

The State supports the continuation of this project. Gas storage has proven to be important toward meeting the needs of the residents of the State, especially during times of low temperatures and high use. We also concur that the on-going project does not materially interfere with or detract from the Refuge's ability to meet its purposes or the mission of the National Wildlife Refuge System and recommend the Service continue to find this use compatible.

The following technical comments apply to specific statements within the CD and do not effect the proposed positive compatibility finding.

Page 1, Establishing and Acquisition Authorities and Refuge Purposes: As enabling legislation for the Kenai National Wildlife Refuge, the Alaska National Interest Lands Conservation Act (ANILCA) did more than change the name, boundaries, and add additional purposes for the Moose Range, it "re-designated" the Moose Range as the Kenai National Wildlife Refuge and identified new purposes for which the refuge was "established and shall be managed" (ANILCA Section 303 (4)(A) and (B)). We request the CD accurately reflect ANILCA as enabling legislation for the Refuge, regardless of USFWS policy to also consider original Range purposes, as noted on page 2 of the CD.

Page 2, last paragraph: While we disagree with the assertion that the Wilderness Act purposes apply to non-designated Wilderness, the relevance of this discussion to the project under consideration is unclear and should be explained. If the project has no effect on designated Wilderness, we request the paragraph be removed or, alternatively, similar to the preceding paragraph, include a statement that it has no bearing on the CD decision.

Thank you for the opportunity to comment.

Sincerely,

A handwritten signature in black ink, appearing to read "S. Magee". The signature is fluid and cursive, with the first letter of the last name being a large, stylized 'M'.

Susan Magee  
ANILCA Program Coordinator