

State of Alaska Comments – Pebble Project Preliminary Draft EIS, Section 3.5 – Recreation

Agency	Comment No.	Section, Paragraph, and Page #	Cooperating Agency Comment (and Purpose of Comment)	Proposed Resolution (Additions or Deletion of Text)	Response
ADF&G/ Habitat/ SPCS	1	pp. 13	Existing recreational use along the pipeline alignment in Cook Inlet and on the Kenai Peninsula consists of boating on Cook Inlet and recreational use at the state park sites on the Kenai Peninsula. Sentence implies that recreational use along the pipeline on the Cook Inlet and Kenai Peninsula are limited to boating and state park use.	EIS should include the multitude of other recreational uses around the pipeline corridor on the Kenai Peninsula such as hunting and stream fishing.	Added text specifically narrowing the Kenai Peninsula portion down to the pipeline and compressor station. Mentioned potential fishing and hunting.
ADF&G/ Habitat/ SPCS	2	pp. 13	Section only attempts to describe recreational use on the Kenai Peninsula and Cook Inlet with respect to the natural gas pipeline but ignores the recreational use on the west side of Cook Inlet and Iliamna Lake.	Include a description of recreational use for the rest of the natural gas pipeline.	Inserted text to clarify that recreation is the same as described for the port and transportation corridor.
ADF&G/ Habitat/ SPCS	3	pp. 14	"...though given the presence of ledges and communities around northern Iliamna Lake."	Change "ledges" to "lodges"	Edit made.
ADF&G/ Habitat	4	Sec 3.5.1.2, pp 3.5-6	The sub-section, Sport Fishing, states that sport fishing is managed by the ADF&G through a permit system. This is incorrect. Sport fish guides are required to have a permit, but in general sport fishing is regulated by regulations and the board process.	Rewrite section for accuracy.	Sentence edited with the information given.
ADF&G/ Habitat	5	Sec 3.5.1.2, pp 3.5-6	The Sport Hunting and Trapping subsection states that hunting is allowed in the	Correct the text in the DEIS to state that MRSGR is open to hunting, except it is closed to brown bear	Text was edited to clarify where hunting is allowed and not allowed for various species.

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			MRSGR. It should be noted that brown bear hunting is not allowed in order to protect McNeil River bears.	hunting in order to provide additional protections to bears using the McNeil River Sanctuary and the State of Alaska's public bear viewing program there.	
ADF&G/ Habitat	6	Sec 3.5.2.6, pp 3.5-13	This section states that, "There are no visible ATV trails along the access road corridor nearing the mine site or along the access road nearing Amakdedori Port." This statement is incorrect as there are ATV trails near the mouth of and along UTC, as well as ATV trails in the immediate vicinity of the corridor south of Kokhanok.	Update/correct section to include ATV trails near the project.	Added ATV trails in the Upper and Lower Talarik Creek areas.
	7	3.5-13	Existing recreational use along the pipeline alignment in Cook Inlet and on the Kenai Peninsula consists of boating on Cook Inlet and recreational use at the state park sites on the Kenai Peninsula. Sentence implies that recreational use along the pipeline on the Cook Inlet and Kenai Peninsula are limited to boating and state park use.	EIS should include the multitude of other recreational uses around the pipeline corridor on the Kenai Peninsula such as hunting and stream fishing, clamming etc. in the vicinity of the pipeline.	The text notes that there is fishing, hunting, clamming, and beach combing near the compressor station on the Kenai Peninsula and discusses recreational use at the state park sites there.
ADF&G/ Habitat	8	3.5-13	Section only attempts to describe recreational use on the Kenai Peninsula and Cook Inlet with respect to the natural gas pipeline but ignores the recreational use on the west side of Cook Inlet and Iliamna Lake.	Include a description of recreational use for the rest of the natural gas pipeline including the west side of Cook Inlet.	The text notes that there is fishing, hunting, clamming, and beach combing near the compressor station on the Kenai Peninsula and discusses recreational use at the state park sites there.

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ADF&G/ Habitat	9	3.5-14	"...though given the presence of ledges and communities around northern Iliamna Lake.."	Change "ledges" to "lodges"	Edit made.
ADF&G/ Sport Fish	10	Sec 3.5.2.1, pp 3.5-6	Sport fishing is not managed through a permit system.	Sport fishing is managed using numerous tools (effort, catch, and harvest information <Statewide Harvest Survey, logbooks>; abundance; size composition etc.) which are mentioned but there is no permit system used to manage the sport fishery.	Text edited to reflect this comment.
ADF&G/ Wildlife/ Refuges	11	3.5-1	"Sport and trophy hunting"	Change to "sport hunting". Trophy hunting is a type of sport hunting.	Edit made.
ADF&G/ Wildlife/ Refuges	12	Sec 3.5.1.2, pp 3.5-4	<p>"The boundary of the refuge portion would be within 1 mile of the transportation corridor."</p> <p>As noted above the proposed road corridor skirts the Refuge boundary at less than a 1,500 feet in a number of locations and only about 250 feet at its closest point.</p>	Accurately describe and depict the project feature locations in relation to Parks and Sanctuaries. In particular the McNeil River State Game Refuge and McNeil River State Game Sanctuary.	Correction made to the distance of MRSGR and MRSGS in relation to the project components.
ADF&G/ Wildlife/ Refuges	13	Sec 3.5.1.2, pp 3.5-4	"Under Alaska Statute (AS) 16.20.162, access permits are required for entry into the McNeil River State Game Sanctuary. Permits are required for bear viewing, special access to the sanctuary (e.g., for scientific, educational and media purposes), transporters, and activities in the sanctuary	<p>Revise to include underlined text:</p> <p>"Under Alaska Statute (AS) 16.20.162, ADF&G Sanctuary Access permits are required for entry into the McNeil River State Game Sanctuary. Access permits are required for any access to the sanctuary including bear viewing, special access to the sanctuary (e.g., for scientific, educational and media</p>	This paragraph has been deleted.

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			other than viewing bears (non-viewing permits) (ADFG 2018e)."	purposes), transporters, and activities in the sanctuary other than viewing bears (non-viewing permits) (ADFG 2018e)." An ADF&G Special Area Permit may also be required for activities within the Sanctuary or Refuge, under AS 16.05.	
ADF&G/ Wildlife/ Refuges	14	Sec 3.5.1.2, pp 3.5-4	Text under Kenai Area Plan misidentifies the KAP units the project occurs in. The Amakdedori Port and portions of the pipeline occurs in Unit 19 Bruin Bay Uplands, not Unit 592. Unit 592, are eelgrass tidelands from Bruin Bay northward. The discussion also mentions the project occurring in KAP Region 7, but gives no details.	Revise and correct section as noted.	This section has been heavily edited for accuracy, and detail was added.
ADF&G/ Wildlife/ Refuges	15	Sec 3.5.1.2, pp 3.5-4	Section on McNeil River State Game Refuge and Sanctuary needs revision and corrections. Inaccurate and incomplete information is contained in this section regarding McNeil River State Game Sanctuary (MRSGS) and Refuge (MRSGR) and references aren't provided to cross check the information. Permit requirements are listed for the MRSGS but not the MRSGR which is actually closer to the project.	SUGGESTED REWRITE: The McNeil River State Game Sanctuary (MRSGS) and Refuge (MRSGR) lay immediately south of the Amakdedori Port site and south transportation route / gas line. They extend north and east from Katmai National Park and Preserve to the shores of Kamishak Bay. The refuge portion is located north of the sanctuary. Both areas were established by the Alaska State Legislature (AS 16.20.041 and AS 16.20.162) for the permanent protection of brown bear, and other fish and wildlife populations and their habitats, for scientific, aesthetic and	Section was edited for accuracy and some suggested additions were made, although some suggested additions were not included.

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				<p>educational purposes. The Legislature provided additional direction for ADF&G to manage human use and activities in a way that is compatible with the primary purpose and maintains and enhances bear-viewing opportunities. The McNeil River State Game Sanctuary was created over 50 years ago in recognition of the unique and exceptional brown bear feeding congregation area and viewing opportunities at McNeil Falls. The McNeil River State Game Refuge was created adjacent to the MRSGS in the early 1990s to provide additional protection to the McNeil brown bears. The MRSGS hosts visitor facilities (i.e., campground, visitor support buildings, trails) and a world class brown bear viewing program which primarily occurs at McNeil River, Mikfik Creek, and along the coast. The MRSGR does not contain yet have any visitor facilities and is located north of the MRSGS. The MRSGR includes most of the Paint River drainage and the Chenik Creek drainage. ; most bear-viewing activities within the refuge occur near Chenik Creek. Smaller numbers of brown bear congregate at Chenik Creek within Chenik Lagoon during late June - late July depending on timing of the sockeye run there. Guided bear viewing and private visitor bear viewing occurs during the month of July. The boundary of the refuge portion would be within 1 mile of the transportation corridor and as close as</p>	

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				<p>several hundred feet in some locations. And it is within 2 miles of the Amakdedori port site.</p> <p>The MRSGS is closed to all hunting and trapping under statute, while the MRSGR is closed to brown bear hunting, but open to other hunting and trapping under Board of Game regulations. Fishing is allowed in portions of the refuge and sanctuary, consistent with current Board of Fisheries regulations.</p> <p>Under Alaska Statute (AS) 16.20.162, access permits are required for entry into the McNeil River State Game Sanctuary. Permits are required for bear viewing, special access to the sanctuary (e.g., for scientific, educational and media purposes), transporters, and activities in the sanctuary other than viewing bears (non-viewing permits). Other public uses are managed by ADF&G Special Area Permits (5 ACC 95.400 and .700—990) and in accordance with the 5 AAC 95.542 and 5 AAC 95.540, which adopts the 2008 McNeil River State Game Refuge and State Game Sanctuary Management Plan into regulation. The 2008 Management Plan for the McNeil River State Game Refuge and Sanctuary includes goals and policies for the sanctuary and refuge management. These policies provide guidance on access and recreational, commercial, and</p>	

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				development activities (ADFG 2008a). Through these permit systems, ADF&G has maintained a world-renowned bear viewing opportunity based on carefully managing human activities to control bear habituation.	
ADF&G/ Wildlife/ Refuges	16	Sec 3.5.1.2, pp 3.5-6	Sportfishing section does not include information on Kamishak River, Little Kamishak River and Strike Creek fisheries. Nor other sportfishing opportunities on the West side of Cook Inlet in the project area.	Revise and correct section to include Sportfishing opportunities on West Side Cook Inlet and Kamishak Bay.	Additional information on recreational opportunities (included sportfishing) was added to the descriptions under the Natural Gas Pipeline and the Amakdedori and Diamond Points.
ADF&G/ Wildlife/ Refuges	17	3.5-6	“brown/grizzly bear” change to brown bear.		Edit made.
ADF&G/ Wildlife/ Refuges	18	Table 3.5-1, pp 3.5-7	“brown/grizzly bear” change to brown bear.		Edit made.